

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE

JOHN R. FISER, Inc.,)
Plaintiff,)
v.) Civil Action No. _____
SELECTIVE INSURANCE COMPANY) JURY DEMAND
OF AMERICA,)
Defendant.)

PETITION FOR REMOVAL

PLEASE TAKE NOTICE that the Defendant, Selective Insurance Company of America, hereby removes this case to the United States District Court for the Eastern District of Tennessee, pursuant to 28 U.S.C. §§ 1441 and 1446. The grounds for the removal are as follows:

1. Plaintiff filed the above-styled action on October 1, 2018 against Selective Insurance Company of America in the Circuit Court of Blount County, Tennessee. A true and correct copy of the Complaint in the suit is styled: John R. Fiser, Inc. v. Selective Insurance Company of America, docket number L-20005 is attached hereto as Exhibit 1.

2. The suit was served on the Tennessee Department of Commerce and Insurance on October 18, 2018, and was sent to Defendant, Selective Insurance Company of America thereafter.

3. Other than the filing of the Complaint, no proceedings have taken place in this matter. This Defendant removes this action to the United States District Court for the Eastern District of Tennessee, pursuant to the provisions of 28 U.S.C. § 1441 on the grounds that this Court has jurisdiction pursuant to 28 U.S.C. §§ 1332 and 1333.

4. Plaintiff, John R. Fiser, Inc. alleges in the Complaint that it is a Tennessee Corporation with its principal place of business in Knox County, Tennessee.

5. Selective Insurance Company of America is a New Jersey Corporation with its principal place of business located in Branchville, Sussex County, New Jersey.

6. This dispute is between persons (companies) of different states and the amount in dispute is in excess of \$75,000.00, exclusive of costs and interest; therefore, it also meets the jurisdictional requirements of this Court pursuant to the provisions of 28 U.S.C. § 1332(a).

7. Venue is correct herein because Plaintiff's action is pending in Blount County, Tennessee.

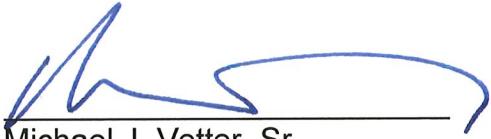
8. Counsel for the Defendant has served on counsel for Plaintiff a copy of this Petition for Removal and a copy of the Petition for Removal be filed in the Blount County Circuit Court by the Defendant within 30 days of service of the Complaint on the Defendant.

WHEREFORE, please take notice that Defendant, the Selective Insurance Company of America removes the state action styled John R. Fiser, Inc. v.

Selective Insurance Company of America, docket number L-20005 from the Circuit Court of Blount County, where it is now pending, to the United States District Court for the Eastern District of Tennessee, on this the 13th day of November, 2018.

Respectfully submitted,

SPICER RUDSTROM PLLC



Michael J. Vetter, Sr.
BPR# 13642
Bank of America Tower
414 Union Street, Suite 1700
Nashville, Tennessee 37219-1823
(615) 259-9080 telephone
(615) 259-1522 facsimile

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been sent via United States mail, postage prepaid, properly addressed to:

W. Tyler Chastain
Bernstein, Stair & McAdams, LLP
116 Agnes Road
Knoxville, TN 37919
(865) 546-8030

this 13th day of November, 2018.



Michael J. Vetter, Sr.

DEFENDANTS FILED 12/1/18
IN THE CIRCUIT COURT FOR BLOUNT COUNTY, TENNESSEE

OCT 01 2018
TOM HATCHER
CIRCUIT COURT CLERK

JOHN R. FISER, INC.,

Plaintiff,

v.

SELECTIVE INSURANCE COMPANY
OF AMERICA,

Defendant.

No. 1-20005
EQUITY

COMPLAINT

Plaintiff, John R. Fiser, Inc. ("Plaintiff" or the "Insured"), by and through legal counsel, for cause of action against Defendant, Selective Insurance Company of America, ("Defendant" or "Selective"), states as follows:

THE PARTIES

1. Plaintiff is a Tennessee corporation with its principal place of business in Knox County, Tennessee.
2. Defendant is an insurance company authorized to do business in Tennessee and may be served with process through its registered agent, Insurance Commissioner, Tennessee Department of Commerce and Insurance, 500 James Robertson Parkway, Nashville, Tennessee 37204.

VENUE AND JURISDICTION

3. Venue and jurisdiction are appropriate in Blount County Circuit Court; Equity, in that the events which comprise the cause of action occurred in Blount County, Tennessee.

FACTUAL ALLEGATIONS

4. The Insured owns commercial real property located at 3260 North Bend Circle, Northpark Boulevard, Building 4, Alcoa, Blount County, Tennessee (the "Subject Property").

5. In late 2016, the Insured noticed cracks forming in the center of the end wall and foundation of the Subject Property.

6. The Insured hired GEOServices to investigate the underlying reason for the cracks forming in the walls and foundation of the Subject Property. GEOServices conducted a limited geotechnical exploration at the Subject Property and in its report to the Insured dated November 14, 2016, opined that results from the initial limited geotechnical exploration at Building 4 within a reasonable degree of engineering certainty indicated that subsidence due to sinkhole activity was the most likely cause of the observed distress at Building 4. A true and accurate copy of the November 14, 2016 GEOServices report is attached hereto as **Exhibit "A"** and incorporated herein by reference.

7. The Insured maintained a Building and Business Personal Property insurance policy with effective dates of December 31, 2015 to December 31, 2016 with a policy limit of \$84,092,826 (the "Policy" or the "Insurance Policy") with Defendant. A true and accurate copy of the Policy is attached hereto as **Exhibit "B"** and incorporated herein by reference.

8. On or around December 16, 2016, the Insured submitted a claim under the Policy (the "Claim") with Selective based on the report of GEOServices attached previously as **Exhibit A**.

9. Selective denied Insured's Claim.

10. In denying the Claim, Selective took (and continues to take the position) the position that the loss to the Subject Property was not caused by sinkhole activity/collapse, but rather from consolidation of fill soil over time. Specifically, Selective stated the Loss:

[W]as caused by differential foundation movement resulting from long-term consolidation of fill soil, which may have been exacerbated by shrink/swell clays. There has been additional evidence of prior repairs to the building and soil surrounding the building. This includes previously repaired cracks in the block walls of the building, concrete buried next to the building, and review of street side photos (Google Maps) dating back to 2012 which show displacement of the concrete blocks.

The information received and reviewed indicates a long term issue at the described location. Further, no documentation has been received which confirms sinkhole collapse has occurred at this property. Based on this and our prior communications, we must reiterate our previous communications that there is unfortunately, no coverage afforded for this for this loss and we must respectfully deny your claim. We regret a more favorable decision could not have been reached.

11. The Insured asserts that Selective, without good cause or engineering findings, has denied the Claim.

12. The Insured's geological information and findings from GEOServices clearly identifies that the loss in question was caused by a covered event, a Sinkhole Collapse.

13. The Insured further submitted to Selective three (3) separate reports and findings of GEOServices, including the following: (a) "Report of Limited Geotechnical Exploration, Northpark Boulevard Buildings 4, 5, and 10 Distress Evaluation", dated November 14, 2016; (b) "Addendum No. 2", dated December 20, 2017; and (c) "Addendum No. 3" dated January 9, 2018. True and accurate copies of these additional reports from GEOServices are attached hereto as Collective Exhibit "C" and incorporated herein by reference.

14. From the first investigation and report of November 14, 2016 and going forward, GEOServices has consistently opined that results from the initial limited geotechnical exploration at the Subject Property within a reasonable degree of engineering certainty indicated that subsidence due to sinkhole activity was the most likely cause of the observed distress at the Subject Property.

15. Pursuant to the DEFINITIONS section under Selective's COMMERCIAL OUTPUT PROGRAM PROPERTY COVERAGE PART (CO-1000 10/02), the denial, based on the evidence presented, is improper. Under the DEFINITIONS, it is provided that:

29. "Sinkhole collapse" means the sudden settlement or collapse of earth supporting the covered property into subterranean voids created by the action of water on a limestone or similar rock formation. It does not include the value of the land or the cost of filling sinkholes.

16. Coverage of the Insured's claim is afforded under the Policy for "Sinkhole Collapse". As per GEOServices, this is the exact event that has caused the loss at the Subject Property.

17. Selective hired Rimkus to conduct an investigation of the Claim and underlying cause of the foundation's movement. Not surprisingly, Rimkus' report did not agree with GEOServices.

18. Addendum No. 3, pages 4 and 5, by GEOServices sets forth additional findings disputing Rimkus's findings and again concluding as set forth in Exhibit C that the damages and loss at Building No. 4 were due to sinkhole activity.

19. Contrary to December 2017 Rimkus report (obtained by Selective) implying the Subject Property was not constructed within a closed contour depression, GEOServices clearly found that per the United States Geological Survey (USGS)

Geologic Map of the Maryville Quadrangle (Cattermole, 1962) that Building 4 was constructed within a mapped closed contour depression, which in turn creates an elevated risk of sinkhole formation.

20. Selective's denial seeks to ignore or minimize, without any applicable basis, the reports and proper findings submitted by GEOServices as to the Sinkhole Collapse at the Subject Property.

21. The losses incurred by the Insured should be covered under the Policy. Tenn. Code Ann. § 56-7-105.

22. The Plaintiff has incurred damages to the Subject Property in an amount no less than \$90,691.75 based on a cost to repair. In addition, Plaintiff seeks additional costs to return the Subject Property to the condition it was in at the date of loss of December 16, 2016, including without limitation:

- (i) Repair/Replace masonry end wall. This will probably require the replacement of this wall;
- (ii) Repair asphalt where borings were taken/settlement occurred at grade level man door;
- (iii) The landscaping repaired/replaced where the foundations were repaired and it was removed;
- (iv) Re-caulk control joints in masonry walls; and,
- (v) Replace office/bathrooms that had to be removed to repair the sinkhole/building foundations.

23. The Plaintiff has and continues to suffer loss of rent due to the refusal of Selective to pay the Claim. The loss of rents for the period of time from January 1, 2017 through August 31, 2018 which totals 20 months at \$1,983.13 per month, is \$39,662.60, which amount will, as stated, increase in the amount of \$1,983.13 monthly.

24. Further, based on demand by Selective, Plaintiff paid half of the Rimkus bill in the amount of \$2,500.00 while reserving its rights to contest its findings and seeking reimbursement for this amount herein.

COUNT I: BREACH OF INSURANCE CONTRACT

25. Plaintiff re-avers allegations contained in Paragraphs 1 through 24 of this Complaint and incorporates them herein by reference.

26. Plaintiff and Defendant entered into a contract of insurance.

27. Defendant breached the insurance contract by refusing to accept Plaintiff's Claims and pay its losses properly due under the Insurance Policy and Plaintiff has suffered damages.

28. Based on the Defendant's breach of the insurance Policy, Plaintiff is entitled to the recovery of all damages proven for such breach, including cost of repairs, and loss rents.

COUNT II: BAD FAITH REFUSAL TO PAY

29. Plaintiff reavers its allegations contained in Paragraphs 1-28 of the Complaint and incorporates them herein by reference.

30. Following the discovery of the sinkhole at the Property, Plaintiff demanded a payment from Defendant under the Insurance Policy.

31. Defendant refused to make adequate payment to Plaintiff as was required under the Insurance Policy.

32. Defendant's refusal to make adequate payment to Plaintiff was made without a reasonable basis in fact or law.

33. Defendant's refusal to make adequate payment to Plaintiff was made in bad faith and for the purpose of denying the benefits of the Insurance Policy to Plaintiff.

34. Defendant owed Plaintiffs the following duties, among others: (a) a duty to honor the insurance contract for the entire policy duration; (b) a duty to conduct a prompt, reasonable and diligent investigation of the facts of the case to determine the

validity of the claims made by Plaintiff against Defendant; (c) a duty to evaluate the Plaintiff's claims fairly; (d) a duty to attempt in good faith to effectuate a prompt, fair and equitable settlement of a claim where liability is reasonably clear; (e) a duty to act promptly and reasonably in settling the claim; (f) a duty not to reject a reasonable and fair offer of settlement; (g) a duty not to put its insured through unnecessary litigation; (h) a duty not to put its insured's assets at risk; (i) a duty to refrain from actions that would injure Plaintiff's ability to obtain the benefits of the insurance contract; and (j) a duty of good faith and fair dealing.

35. Defendant breached the Insurance Policy and its duties owed to Plaintiff.

36. Plaintiff gave Defendant sixty (60) days' notice pursuant to Tenn. Code Ann. § 56-7-105 that it intended to claim bad faith refusal to pay on Defendant's part.

37. Defendant's actions herein constitute bad faith insurance practices under Tennessee law codified at Tenn. Code Ann. § 56-7-105 et seq.

38. Pursuant to the above referenced statute, Plaintiff seeks a sum not exceeding twenty-five percent (25%) on the liability for the loss from Defendant due to its bad faith insurance practices plus attorney's fees Plaintiff incurred in bringing this action against Defendant.

WHEREFORE, premises considered, Plaintiff, John R. Fiser, Inc. prays that it be accorded the following relief:

1. That process is served on Defendant, Selective Insurance Company of America and it be required to answer the Complaint;

2. That the Court enter a judgment against Defendant in favor of Plaintiff for damages to the Subject Property caused by Defendant's breach of contract and incidental and consequential damages in an amount to be proven at trial but in any

event, no less than \$95,000.00 plus loss of rents at \$1,983.13 per month as well as expenses paid for reports and assessments;

3. That the Court award an additional twenty-five percent (25%) of the liability award to Plaintiff as damages and award attorney's fees and discretionary costs in bringing this action against Defendant due to the bad faith refusal to pay Defendant pursuant to Tenn. Code Ann. § 56-7-105 et seq.;
4. That all costs of this action be taxed against the Defendant; and
5. That Plaintiff have such other, further and general relief to which it may be entitled.

Respectfully submitted,

BERNSTEIN, STAIR & MCADAMS LLP

By: 

W. TYLER CHASTAIN (BPR #016029)
116 Agnes Road
Knoxville, Tennessee 37919
(865) 546-8030

Counsel for Plaintiff, John R. Fiser, Inc.

EXHIBIT A



November 14, 2016

Fiser, Inc.
201 Sherlake Lane
Knoxville, Tennessee 37922

Attention: Mr. Chris Cole
ccole@fiserinc.com

Subject: **REPORT OF LIMITED GEOTECHNICAL EXPLORATION**
North Park Boulevard Buildings 4, 5, and 10 Distress Evaluation
Alcoa, Tennessee
GEOServices Project No. 21-16708R1

Dear Mr. Cole:

GEOServices, LLC has completed the report of limited geotechnical exploration performed for the subject project. Our services were performed in accordance with our Proposal No. 11-16325, dated October 6, 2016, and as authorized by you. The purpose of our exploration was to explore the site subsurface conditions in the area of the observed distress and provide geotechnical recommendations as to the cause and recommendations for remediation of the observed distress, if found to be geotechnically related.

PROJECT INFORMATION

The project site is located at the North Park commercial development in Alcoa, Tennessee. GEOServices visited the site on October 5, 2016, to observe the distress that has been recently observed at Buildings 4, 5, and 10. During our site visit, we noted that each building has experienced apparent cracking near the building corners. The entrance doors at each location have also moved and are difficult to operate. Additionally, we observed heaving, depressed, and cracked soils adjacent to the outside walls of buildings 4 and 5. We also observed ground subsidence outside of building 4, which may be indicative of karst activity. As a result of the observed distress and ground subsidence, we have been asked to perform a limited geotechnical exploration to determine the cause of the distress and to provide recommendations for remediation, should they be determined to be geotechnical related.

GEOServices, LLC; 2561 Willow Point Way; Knoxville, Tennessee 37931; Phone: (865) 539-8242; Fax: (865) 539-8252

FIELD EXPLORATION

The site subsurface conditions were explored with three (3) soil test borings performed adjacent to the building corners. Boring B-1 is located at Building 10, boring B-2 is located Building 5, and Boring B-3 is located at Building 4. The boring locations were marked in the field by GEOServices personnel. All depths in this report reference the ground surface that existed at the time of this exploration; however, ground surface elevations were not provided.

Drilling was performed on November 4, 2016. The borings were advanced using 3.25-inch inside diameter hollow stem augers (HSA) with a CME 55 truck-mounted drill rig. Within each boring, standard penetration test (SPT) and split-spoon sampling were performed at 2.5 foot intervals in the upper 10 feet, and 5 feet intervals thereafter. The drill crew worked in general accordance with ASTM International (ASTM) D 6151 method for HSA drilling. Sampling of overburden soil was performed in general accordance with ASTM D 1586, per the SPT procedure. The borings were backfilled with soil cuttings and pavements were patched before departing the site. Detailed information pertaining to each boring location can be found on the boring logs provided as an attachment to this report.

After completion of the field drilling and sampling phase of this project, the soil samples were returned to our laboratory where they were visually classified in general accordance with the Unified Soil Classification System (USCS – ASTM D 2487) by a GEOServices geotechnical professional. Select samples were then tested for moisture content (ASTM D 2216) and Atterberg limits determinations (ASTM D 4318).

GEOLOGIC CONDITIONS

The project site, and most of East Tennessee, lies in the Appalachian Valley and Ridge Physiographic Province. The Province is characterized by elongated, northeasterly-trending ridges formed on highly resistant sandstones and shales. Between ridges, broad valleys and rolling hills are formed primarily on less resistant limestones, dolomites and shales.

Published geologic information indicates that the site is underlain by bedrock of the Knox Group. The Knox Group is composed of the Mascot Dolomite, Kingsport Dolomite, Longview Dolomite, Chepultepec Dolomite, and Copper Ridge Dolomite Formations. However, the Knox Group is not differentiated into its individual formations in this area. The Knox Group, where undivided, consists of siliceous dolomite with inter-bedded limestone. These rock units weather to produce a thick residual clay overburden. Silica in the form of chert is resistant to weathering and is scattered in various quantities throughout the clay residuum.

SUBSURFACE CONDITIONS

The following subsurface description is of a generalized nature to highlight the subsurface stratification features and material characteristics at the boring locations. The boring logs included at the end of this report should be reviewed for specific information at each boring location. Information on actual subsurface conditions exists only at the specific boring locations and is relevant only to the time that this exploration was performed. Variations may occur and should be expected at the site.

Surface

A surficial layer of topsoil was encountered in borings B-1 and B-3 ranging from 2 to 6 inches in thickness. Boring B-2 encountered a surficial layer of asphalt approximately 3 inches in thickness overlying basestone that was approximately 4 inches in thickness.

Fill

Underlying the existing surficial materials, fill material was encountered in each boring to depths ranging from approximately 9 to 17 feet beneath the existing ground surface. Fill material is classified as soils that have been transported and placed in their current location by man. The existing fill material generally consisted of dark brown and tan fat clays (CH) with isolated zones of organics. SPT N-values used to evaluate the fill materials ranged from 9 to 19 blows per foot (bpf) indicating the fill is of stiff to very stiff in consistencies. However, the N-values that indicate stiff soils were judged to be elevated due to rock fragments within the samples. Therefore, the existing fill material encountered in the borings drilled across the site was likely firm in consistency.

The in-situ moisture content of selected samples of existing fill ranged from about 13 to 47 percent. Atterberg limits testing on selected samples of fill soil indicated liquid limits (LL) ranging from 33 to 49 percent and plasticity indices (PI) ranging from 17 to 27 percent. The selected samples of fill soil tested for plasticity are classified as lean clay (CL) in accordance with the Unified Soil Classification System (USCS).

Residual Soil

Residual soils were encountered in each of the three borings underlying the existing fill material to auger refusal depths ranging from 42.2 to 52 feet beneath the existing ground surface. Residual soils are formed from in-place weathering of the parent bedrock. The residual soil generally consisted of brown, reddish brown, and orangish brown fat clays (CH) with varying amounts shale fragments. The SPT N-value used to evaluate the consistency of the residual soil ranged from 3 bpf to 50 blows with 1 inch of penetration, indicating a consistency of soft to very hard. However, the N-values that indicate hard, or greater, consistency soils (SPT N-values exceeding 30 bpf) were encountered nearing auger refusal and judged to be elevated due auger refusal materials. Therefore, the existing fill material encountered in the borings drilled across the site was likely soft to very stiff in consistency. The in-situ moisture content of selected samples of residual soils ranged from 18 to 47 percent.

Auger Refusal

Auger refusal was encountered in each of the three (3) boring at depths ranging from 42.2 to 52 feet beneath the existing ground surface. Auger refusal is a designation applied to any material that cannot be penetrated by typically soil drilled equipment and tooling. Sampling of the auger refusal material (i.e. rock coring) was beyond the scope of services for this project; therefore, the character and continuity of the refusal materials was not determined. However, based on our experience in this geology we expect auger refusal material encountered was top of bedrock.

Ground Water

Ground water was not encountered in any of the three borings drilled on site. Ground water levels may fluctuate due to seasonal changes in precipitation amounts, construction activities in the area,

and/or the level of nearby water features. The ground water information presented in this report is the information that was collected at the time of our field activities.

FINDINGS AND RECOMMENDATIONS

The conclusions and recommendations presented in this report are based on our site reconnaissance and the results of this exploration. Actual subsurface conditions may vary between or away from the boring location. If it becomes apparent during remediation that encountered conditions vary substantially from those presented herein, this office should be notified at once. At that time, the conditions can be evaluated and the recommendations of this report can be modified in written form if necessary.

The results of our exploration indicate that all borings are generally underlain by fill overlying residual soils. Furthermore, based on our review of historical topographic quadrangle maps (Maryville, TN Quadrangle) it appears that the majority of the development along North Park Boulevard was constructed within a large closed contour depression. Information on the development of the site, in relation to any remediation of the previously existing closed contour depression, is not known.

The consistency of the residual soil encountered generally decreased with depth while the moisture contents generally increased with depth. Typical characteristics of karst solutioning consist of SPT N-values decreasing with depth and moisture contents typically increasing with depth. Based on the results from our subsurface exploration and the known site history (i.e. previously contained a closed contour depression) the N-values and moisture contents found in the soil test boring indicate characteristics of karst solutioning (sinkholes).

Remediation options for the observed distress is limited due to the depth of bedrock and the existing use of the property. It is our opinion that remediation of the observed distress would require a combination of cap grouting and compaction grouting. This combination would address karst features at the ground surface and also provide densification of the upper soils below foundations. The following section includes more detailed information about grouting.

GROUTING RECOMMENDATIONS

In general, cap grouting consists of pumping low slump grout through steel casing to the top of bedrock to support the soil overburden and reduce the potential for downward migration through pinnacled bedrock. The grout is pumped at low pressures to displace soft soil and fill voids as the casing is extracted. Compaction grouting of the soils is performed to improve the general strength of the upper soils and to provide a stiffer layer of soils over the bedrock surface. If requested, GEOservices can prepare a detailed cap and compaction grouting program for the project. In addition, can assist you during the bid process and help evaluate contractor proposals to determine the contractors approach and methodology to successfully remediate the areas of concern.

LIMITATIONS

This report has been prepared in accordance with generally accepted geotechnical engineering practice for specific application to this project. This report is for our geotechnical work only. The conclusions and recommendations contained in this report are based upon applicable standards of our practice in this geographic area at the time this report was prepared. No other warranty, express or implied, is made.

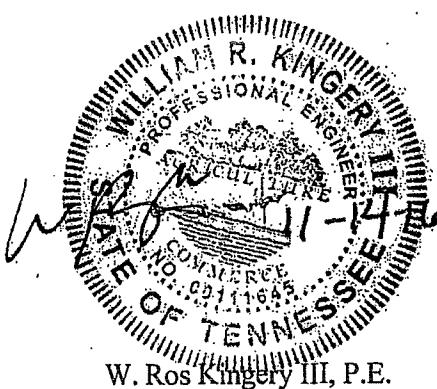
We appreciate the opportunity to provide these services. If you have any questions please feel free to contact us at your convenience.

Sincerely,

GEOservices, LLC



Matt T. Bible, E.I.
Staff Professional



W. Ros Kingery III, P.E.
Vice President
TN 111645

Attachments: Site Vicinity Map, Boring Location Plan, Photo Page, Boring Legend Boring Logs, and Laboratory Results

ATTACHMENTS



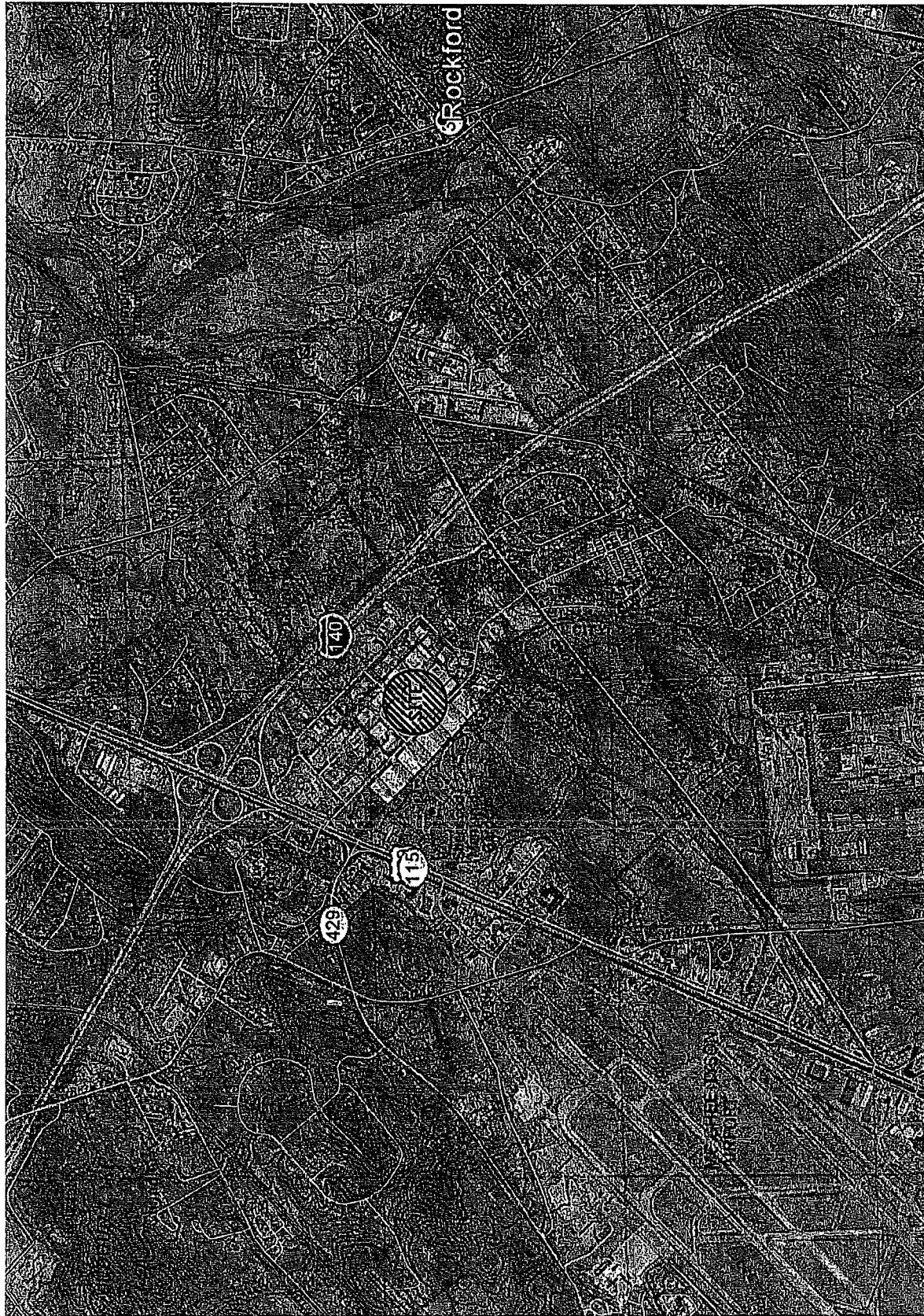


FIGURE		1	
DRAWN BY:	MRB	APPROVED BY:	WRK
SCALE:	N.T.S.	DATE:	21-16708
JOB NO.:	11-9-2016	FIGURE	
SITE VICINITY MAP			
NORTH PARK BUILDINGS 4, 5, AND 10			
NORTH PARK BOULEVARD AND NORTHBEND CIRCLE			
ALCOA, TN			
GEOS			
GEOServices, LLC dba Geospatial Engineers			
2681 Willow Point Way Office: 865-589-0262 Knoxville, Tennessee 37931 Fax: 865-589-0262			

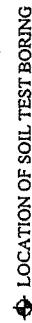
NOTES:
1. BASE MAP-USGS QUADRANGLE (MARYVILLE, TENNESSEE)



BORING LOCATION PLAN		FIGURE 2
DRILLING NO.	MTB	
APPROVED BY:	WRK	
SCALE:	N.T.S.	
JOB NO.:	21-16708	
DATE:	11-9-2016	
GEOS Services, LLC-Geotechnical and Materials Engineers 2551 Willow Point Way Knoxville, Tennessee 37931 Office: 865-538-8242 Fax: 865-538-8252		

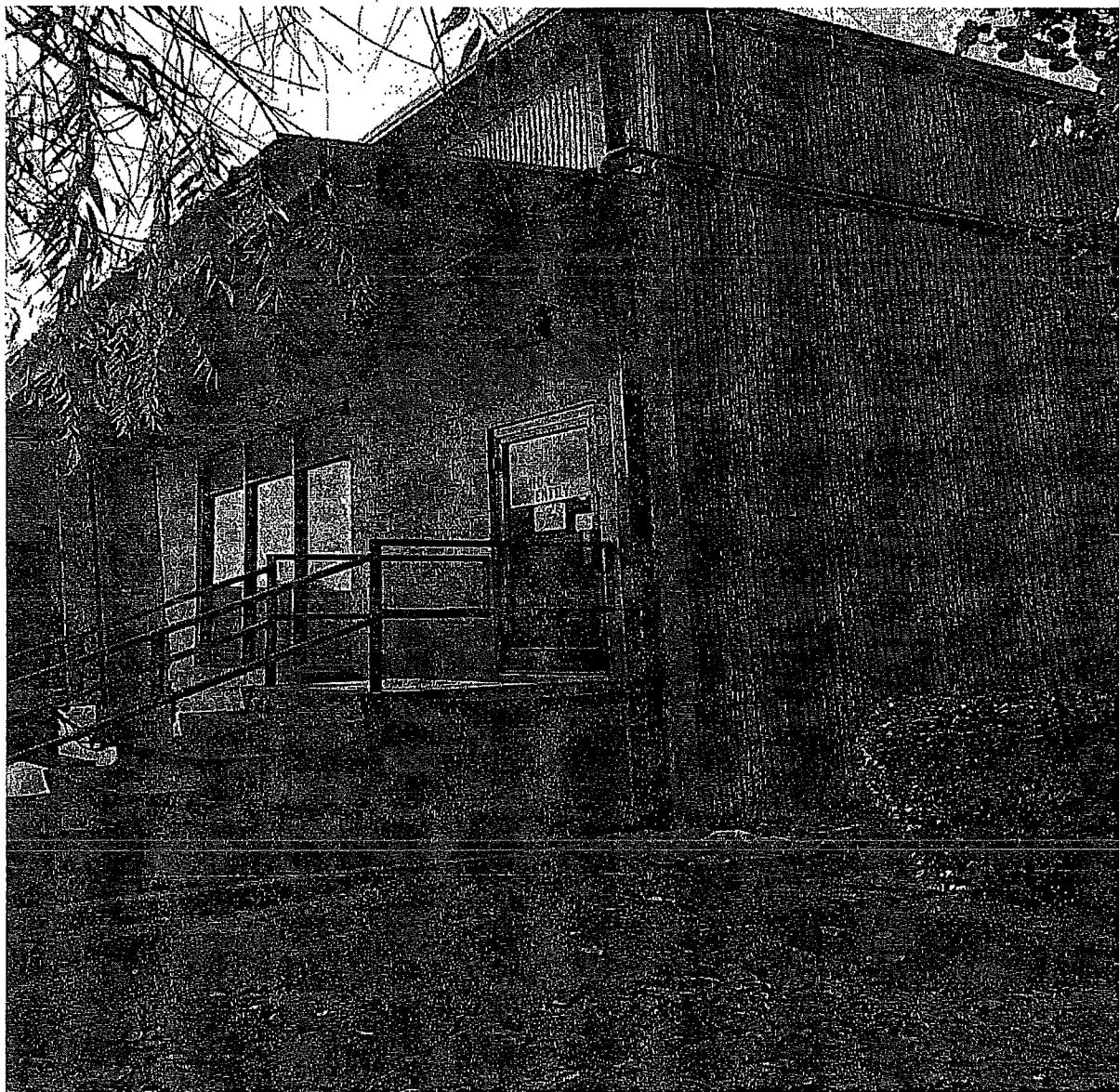
NOTES:

- 1.) BORING LOCATIONS ARE SHOWN IN GENERAL ARRANGEMENT ONLY.
- 2.) DO NOT USE BORING LOCATIONS FOR DETERMINATIONS OF DISTANCES OR QUANTITIES.
- 3.) PHOTOS PROVIDED BY: Google Earth, Inc.



North Park Building Distress
Alcoa, Tennessee
Project No. 21-16708
November 9, 2016

GEOS
GEOservices, LLC Geotechnical and Materials Engineers



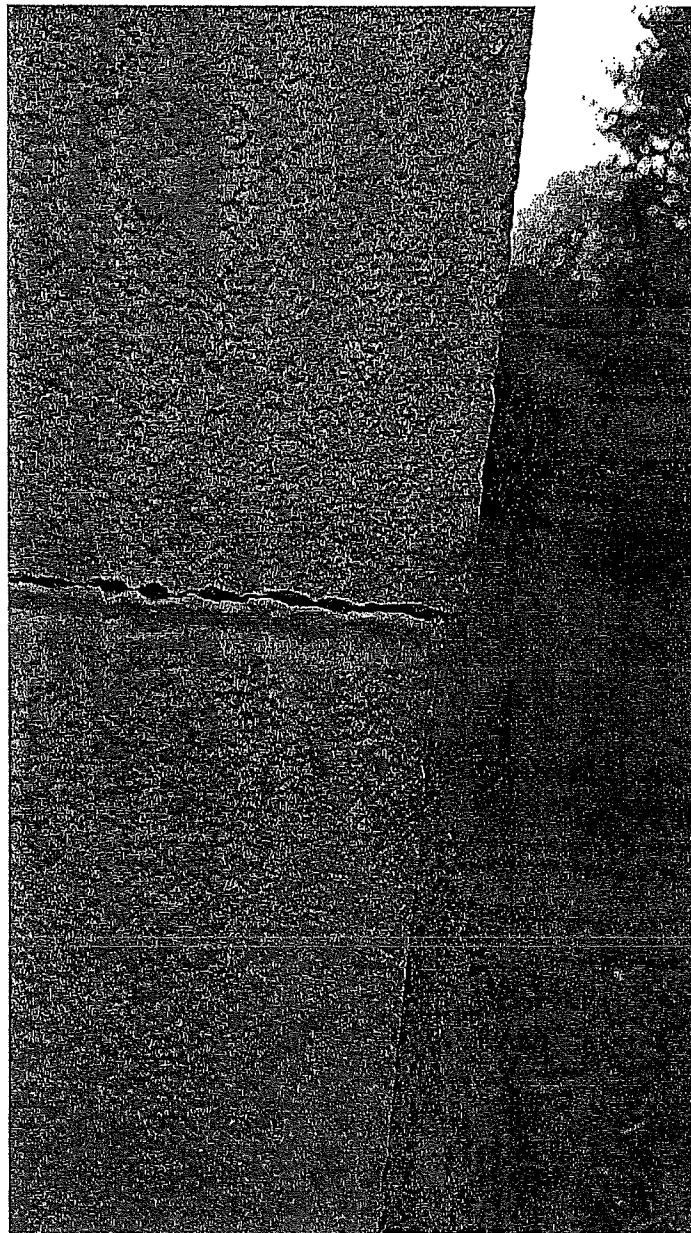
**Building 10
Stair Step Cracking**

North Park Building Distress
Alcoa, Tennessee
Project No. 21-16708
November 9, 2016



Building 10
Water Seepage thru curb

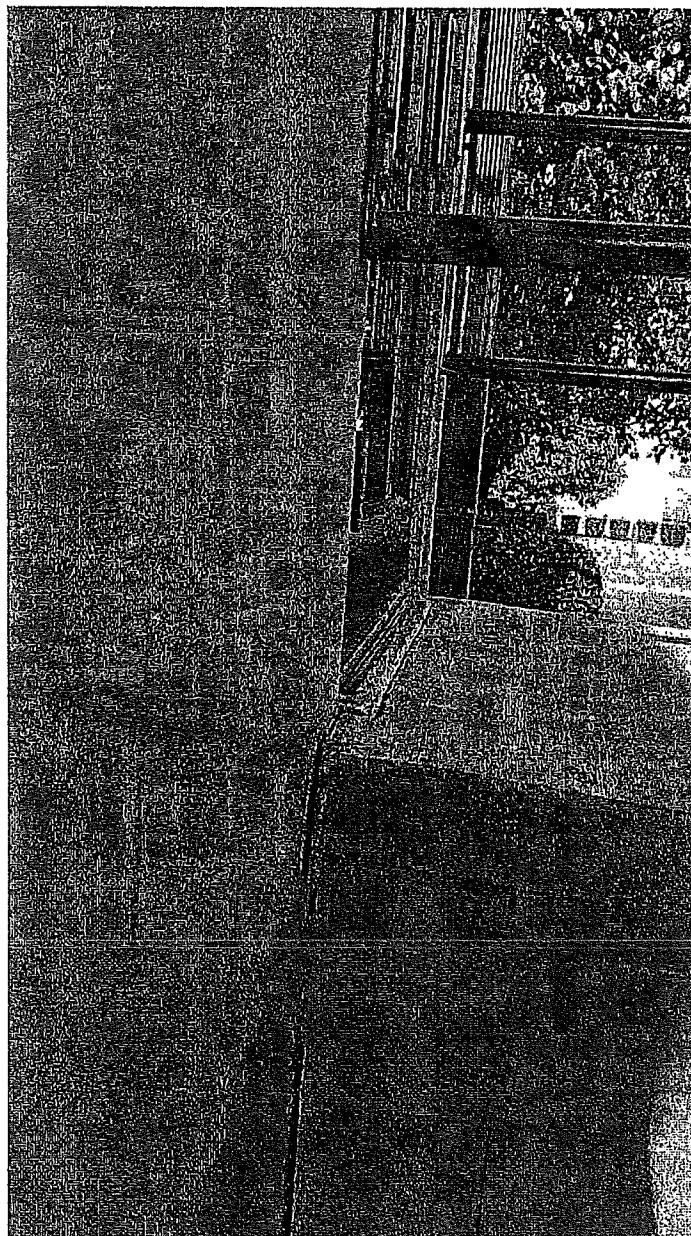
North Park Building Distress
Alcoa, Tennessee
Project No. 21-16708
November 9, 2016



Building 10
Facing North – Displacement of CMU

North Park Building Distress
Alcoa, Tennessee
Project No. 21-16708
November 9, 2016

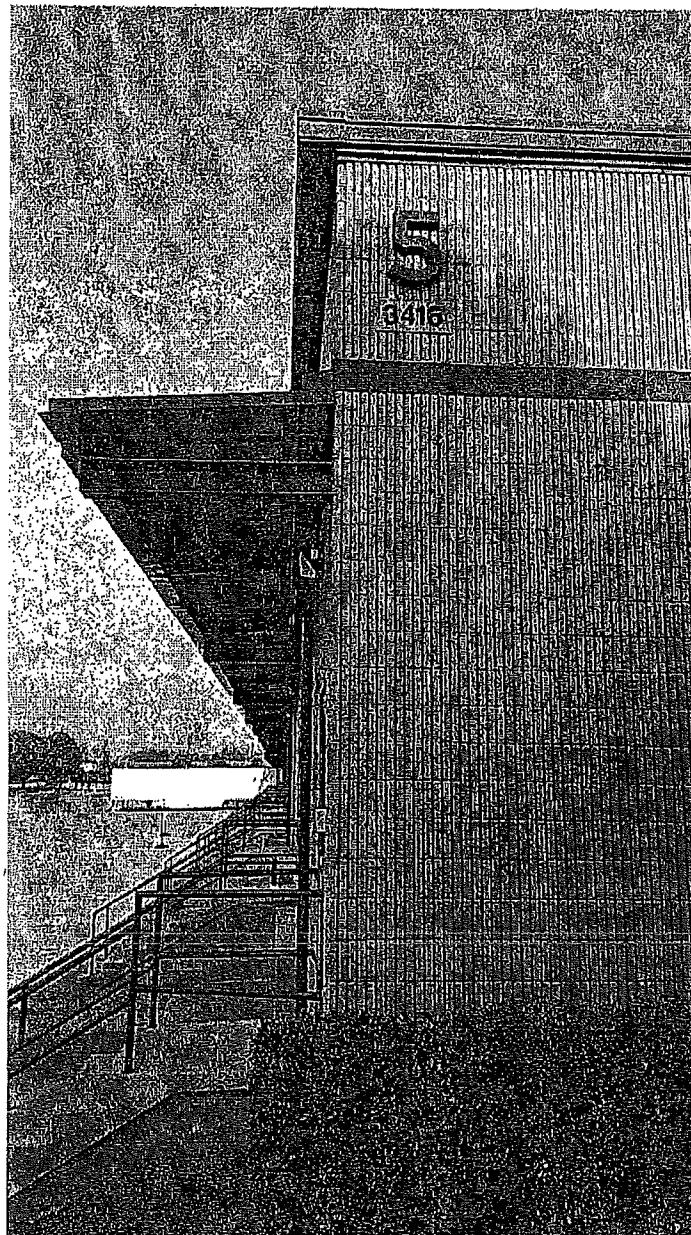
GEOS
GEOservices, LLC - Geotechnical and Materials Engineers



**Building 10
Stairs Separating from Southern Wall**

North Park Building Distress
Alcoa, Tennessee
Project No. 21-16708
November 9, 2016

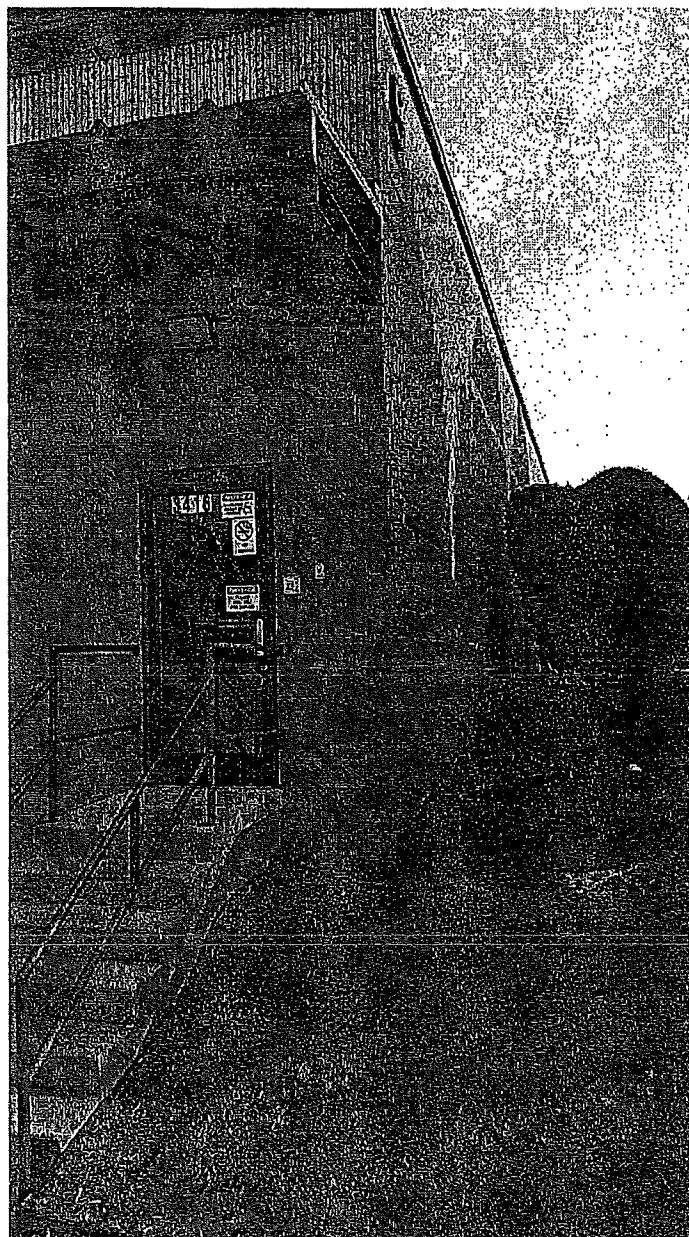
GEOS
GEOServices, LLC-Geotechnical and Materials Engineers



**Building 5
Facing East – Stair Step Cracking in Wall**

North Park Building Distress
Alcoa, Tennessee
Project No. 21-16708
November 9, 2016

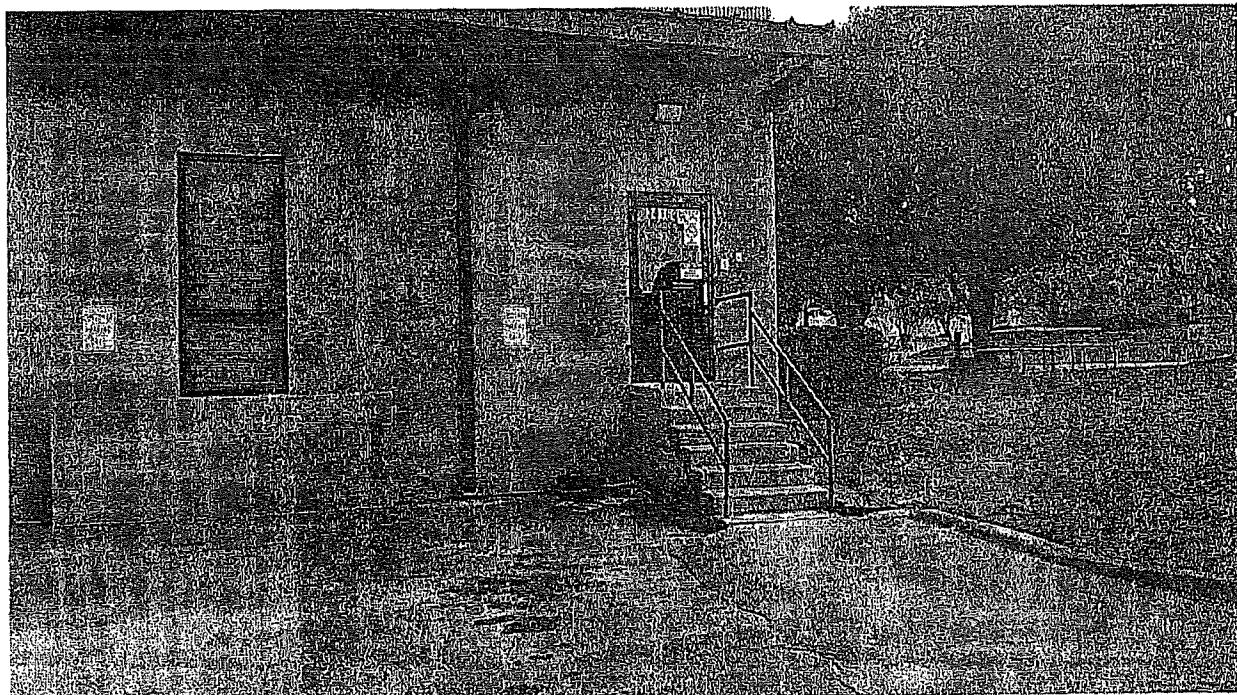
GEOS
GEOservices, LLC-Geotechnical and Materials Engineers



Building 5
Facing South—Stair Step Cracking in Wall

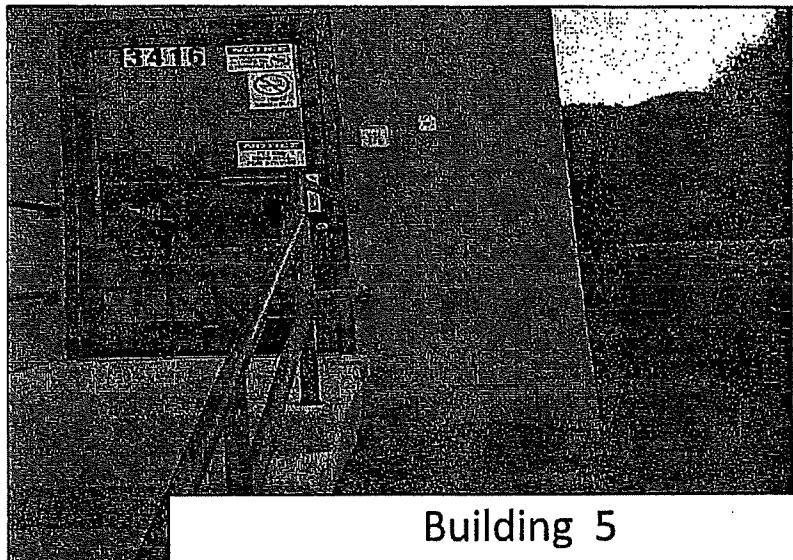
North Park Building Distress
Alcoa, Tennessee
Project No. 21-16708
November 9, 2016

GEOS
GEOServices, LLC Geotechnical and Materials Engineers



Building 5
Facing South—Cracking in asphalt

North Park Building Distress
Alcoa, Tennessee
Project No. 21-16708
November 9, 2016



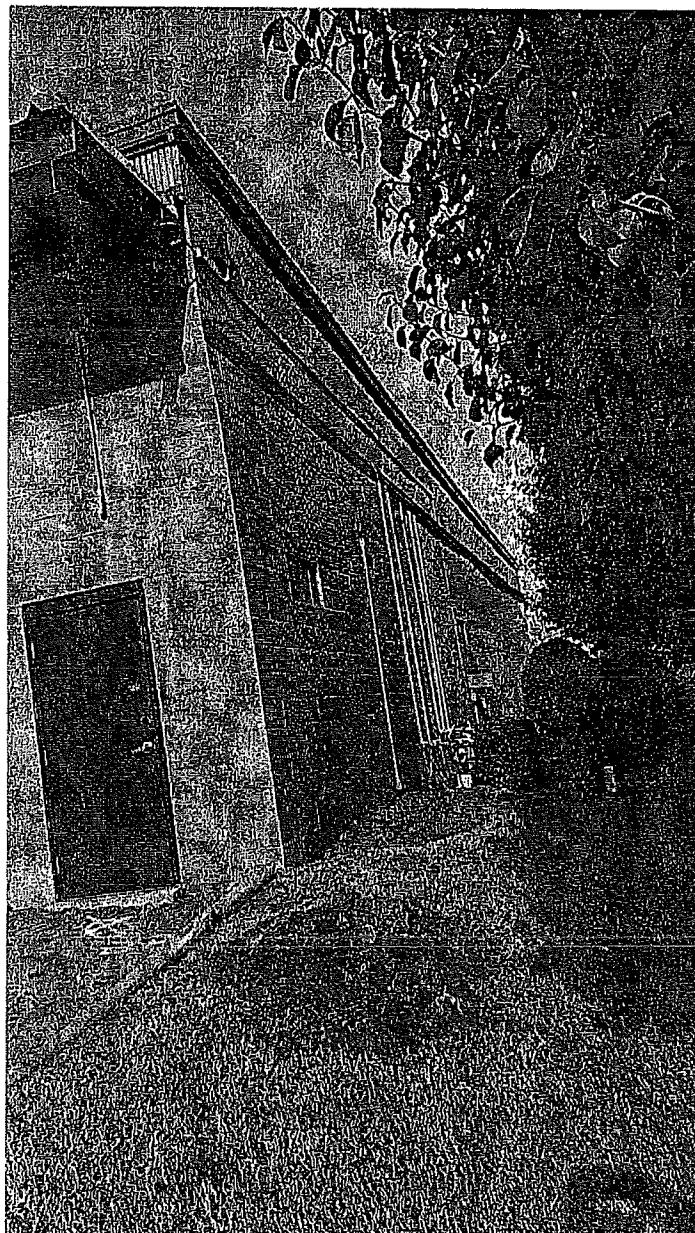
Building 5
Facing South – 1-2 foot Dip in soil at
corner



Building 5
Dip in soil with cracks

North Park Building Distress
Alcoa, Tennessee
Project No. 21-16708
November 9, 2016

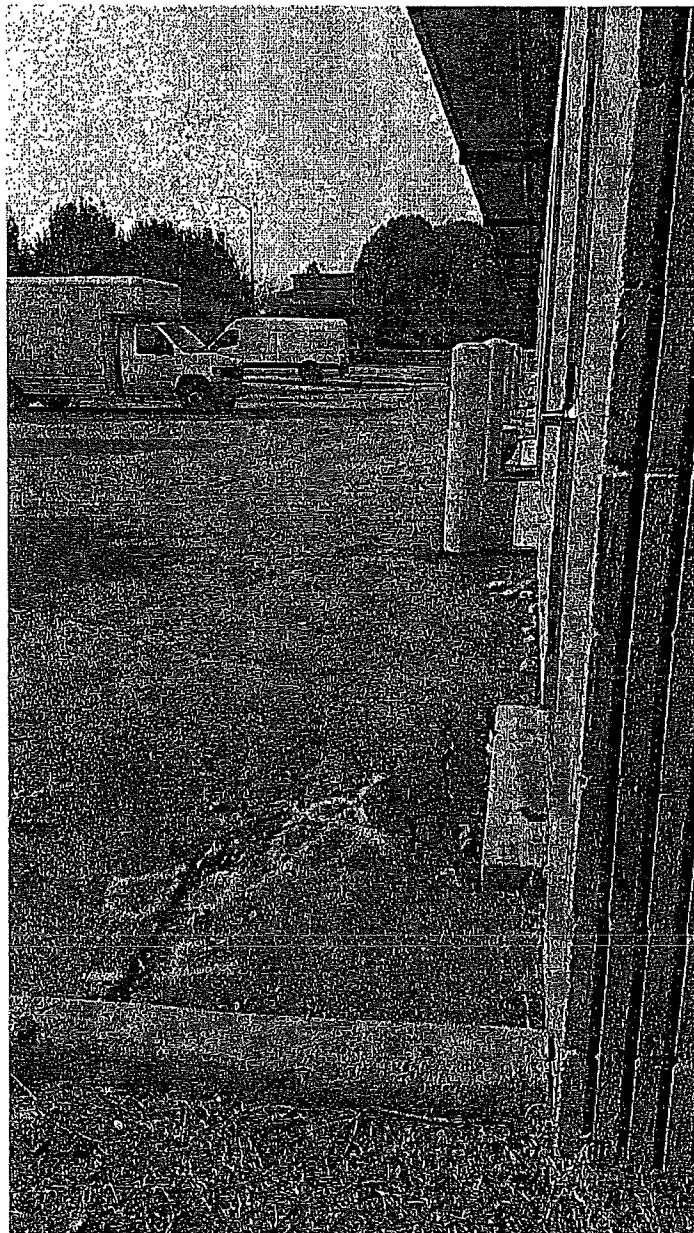
GEOS
GEOservices, LLC-Geotechnical and Materials Engineers



Building 4
Facing East—Cracking in asphalt and CMU and
heaving in soil

North Park Building Distress
Alcoa, Tennessee
Project No. 21-16708
November 9, 2016

GEOS
GEOServices, LLC-Geotechnical and Materials Engineers



Building 4
Facing East– Cracking in asphalt and CMU

North Park Building Distress
Alcoa, Tennessee
Project No. 21-16708
November 9, 2016



**Building 4
Facing West (along southern wall) – Heaving and
Cracking in Soil**

North Park Building Distress
Alcoa, Tennessee
Project No. 21-16708
November 9, 2016

GEOS
GEOServices, LLC-Geotechnical and Materials Engineers



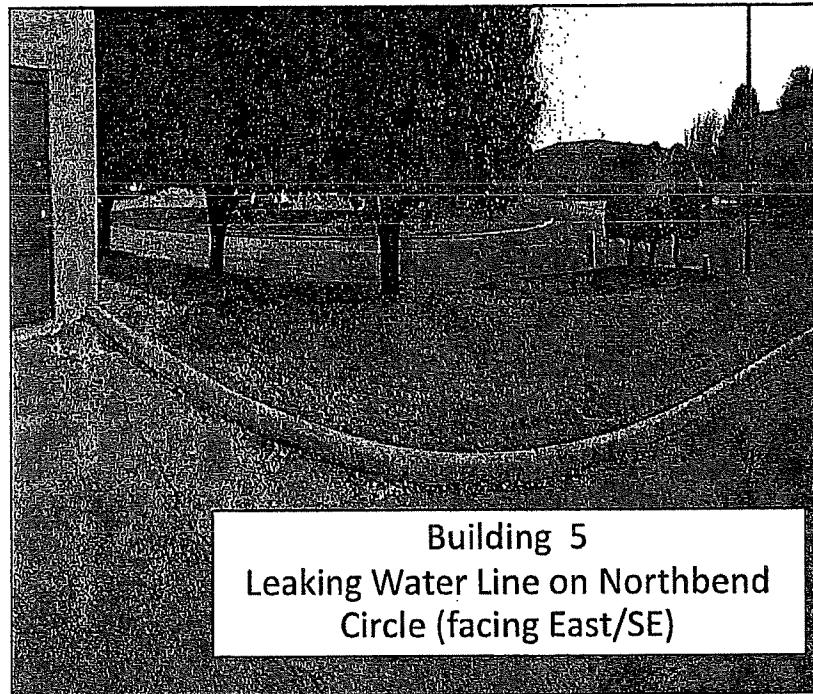
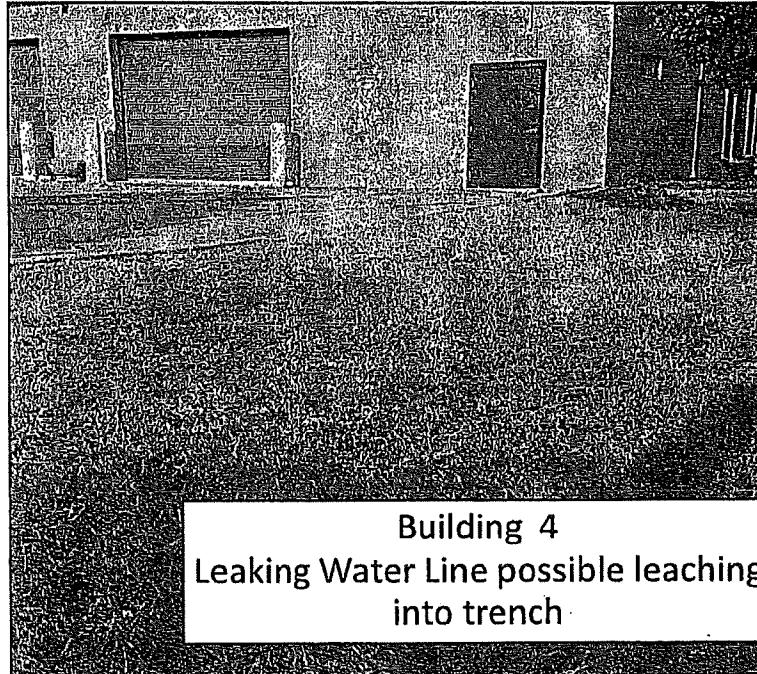
Building 4
Leaking Water Line on Northbend
Circle (facing South)



Building 5
Leaking Water Line on Northbend
Circle (facing West/NW)

North Park Building Distress
Alcoa, Tennessee
Project No. 21-16708
November 9, 2016

GEOS
GEOServices, LLC-Geotechnical and Materials Engineers





GEOservices, LLC-Geotechnical and Materials Engineers

Northpark Boulevard
Alcoa, Tennessee
GEOservices Project # 21-16708

LOG OF BORING B-1
SHEET 1 OF 3

DRILLER Danny King
ON-SITE REP.

BORING NO. / LOCATION		B-1		DRY ON COMPLETION ?		Yes						
DATE	November 4, 2016	SURFACE ELEV.	FT.									
REFUSAL:	Yes	DEPTH	52.0 FT.	ELEV.	-52.0 FT.							
SAMPLED	52.0 FT.		15.8 M									
TOP OF ROCK		DEPTH	FT.	ELEV.	FT.							
BEGAN CORING		DEPTH	FT.	ELEV.	FT.							
FOOTAGE CORED (LF)		FT.										
BOTTOM OF HOLE DEPTH	52.0 FT.			ELEV.	-52.0 FT.							
BORING ADVANCED BY:		POWER AUGERING	X			PROPOSED FFE:	FT.					
STRATUM DEPTH		SAMPLE DEPTH		SAMPLE OR RUN NO.	SAMPLE TYPE	FIELD RESULTS	LABORATORY RESULTS	STRATUM DESCRIPTION				
FT.	FT.	FROM	TO			N-Value	Qu	LL	PI	%M		
											Topsoil (6 Inches)	
2.5	-2.5	1.0	2.5	1	SS	16						
5.0	-5.0	3.5	5.0	2	SS	16		33	17	16.7	Lean CLAY (CL) - with rock fragments - brown and reddish brown - slightly moist - very stiff (FILL)	
7.5	-7.5	6.0	7.5	3	SS	19				16.1		
10.0	-10.0	8.5	10.0	4	SS	16				17.7		
12.5	-12.5											
15.0	-15.0	13.5	15.0	5	SS	16				26.8	Fat CLAY (CH) - with trace shale fragments - reddish brown and orangish brown - slightly moist to wet, increasing with depth - very stiff to soft (RESIDUUM)	
17.5	-17.5											
20.0	-20.0	18.5	20.0	6	SS	11				37.3		

(continued)

REMARKS:



Northpark Boulevard

Alcoa, Tennessee

GEOservices Project # 21-16708

LOG OF BORING

B-1

SHEET 2 OF 3

DRILLER Danny King

ON-SITE REP.

Yes

BORING NO. / LOCATION

B-1

DRY ON COMPLETION ?

DATE November 4, 2016
 REFUSAL: Yes DEPTH 52.0 FT.
 SAMPLED 52.0 FT. 15.8 M
 TOP OF ROCK DEPTH FT.
 BEGAN CORING DEPTH FT.
 FOOTAGE CORED (LF) FT.
 BOTTOM OF HOLE DEPTH 52.0 FT.

SURFACE ELEV. FT.
 ELEV. -52.0 FT.
 ELEV. FT.
 ELEV. FT.
 ELEV. -52.0 FT.

WATER LEVEL DATA (IF APPLICABLE)
 COMPLETION: DEPTH Dry FT.
 ELEV. FT.
 AFTER 1 HRS: DEPTH TNP FT.
 ELEV. FT.
 AFTER 24 HRS. DEPTH TNP FT.
 ELEV. FT.

BORING ADVANCED BY:

POWER AUGERING X

PROPOSED FFE: FT.

STRATUM DEPTH	SAMPLE DEPTH		SAMPLE OR RUN NO.	FIELD RESULTS		LABORATORY RESULTS			STRATUM DESCRIPTION
	FROM	TO		SAMPLE TYPE	N-Value	Qu	LL	PI	
	FT.	FT.							
-									(continued)
-									
-									
22.5	-22.5								
-									
-									
25.0	-25.0								
-									
-									
27.5	-27.5								
-									
-									
30.0	-30.0								
-									
-									
32.5	-32.5								
-									
-									
35.0	-35.0								
-									
-									
37.5	-37.5								
-									
-									
40.0	-40.0								
									(continued)

REMARKS:



Northpark Boulevard

Alcoa, Tennessee

GEOServices Project # 21-16708

LOG OF BORING

B-1

SHEET 3 OF 3

DRILLER Danny King

ON-SITE REP.

Yes

BORING NO. / LOCATION

B-1

DRY ON COMPLETION ?

DATE November 4, 2016 SURFACE ELEV. FT.
 REFUSAL: Yes DEPTH 52.0 FT. ELEV. -52.0 FT.
 SAMPLED 52.0 FT. 15.8 M
 TOP OF ROCK DEPTH FT. ELEV. FT.
 BEGAN CORING DEPTH FT. ELEV. FT.
 FOOTAGE CORED (LF) FT.
 BOTTOM OF HOLE DEPTH 52.0 FT. ELEV. -52.0 FT.

BORING ADVANCED BY:

POWER AUGERING X

PROPOSED FFE: FT.

WATER LEVEL DATA (IF APPLICABLE)

COMPLETION: DEPTH Dry FT.
 ELEV. FT.
 AFTER 1 HRS: DEPTH TNP FT.
 ELEV. FT.
 AFTER 24 HRS: DEPTH TNP FT.
 ELEV. FT.

STRATUM DEPTH	SAMPLE DEPTH		SAMPLE OR RUN NO.	FIELD RESULTS		LABORATORY RESULTS			STRATUM DESCRIPTION	
	FROM	TO		SAMPLE TYPE	N-Value	Qu	LL	PI		
	FT.	FT.								
-									(continued)	
-									-	
-									-	
42.5	-42.5								-	
-									-	
-									-	
45.0	-45.0								-	
-									-	
-									-	
47.5	-47.5								-	
-									-	
50.0	-50.0								-	
-									-	
-									-	
52.5	-52.5								-	
-									-	
-									-	
55.0	-55.0								-	
-									-	
-									-	
57.5	-57.5								-	
-									-	
-									-	
60.0	-60.0								-	

REMARKS: _____

Auger Refusal at 52.0 Feet



Northpark Boulevard

Alcoa, Tennessee

GEOservices Project # 21-16708

LOG OF BORING

B-2

SHEET 1 OF 3

DRILLER Danny King

ON-SITE REP.

BORING NO. / LOCATION

B-2

DRY ON COMPLETION ?

Yes

DATE November 7, 2016

SURFACE ELEV. FT.

REFUSAL: Yes DEPTH 49.2 FT.

ELEV. -49.2 FT.

SAMPLED 49.2 FT. 15.0 M

TOP OF ROCK DEPTH FT.

ELEV. FT.

BEGAN CORING DEPTH FT.

ELEV. FT.

FOOTAGE CORED (LF) FT.

BOTTOM OF HOLE DEPTH 49.2 FT.

ELEV. -49.2 FT.

BORING ADVANCED BY:

POWER AUGERING X

PROPOSED FFE: FT.

WATER LEVEL DATA (IF APPLICABLE)

COMPLETION: DEPTH Dry FT.

ELEV. FT.

AFTER 1 HRS: DEPTH TNP FT.

ELEV. FT.

AFTER 24 HRS: DEPTH TNP FT.

ELEV. FT.

STRATUM DEPTH	SAMPLE DEPTH		SAMPLE OR RUN NO.	FIELD RESULTS		LABORATORY RESULTS			STRATUM DESCRIPTION
	FROM	TO		SAMPLE TYPE	N-Value	Qu	LL	PI	
	FT.	FT.							
-									Asphalt (3 Inches), Basestone (4 Inches)
-									
-									
-									
2.5	-2.5		1	SS	10				Fat CLAY (CH) - with organics and rock fragments - dark brown - moist (FILL)
-									
-									
5.0	-5.0		2	SS	9		40	21	12.7
-									
-									
7.5	-7.5		3	SS	13				Fat CLAY (CH) - with silt and rock fragments - tan and dark brown - slightly moist (FILL)
-									
-									
10.0	-10.0		4	SS	13				26.8
-									
-									
12.5	-12.5								29.7
-									
-									
15.0	-15.0		5	SS	8				23
-									
-									
17.5	-17.5								Fat CLAY (CH) - reddish brown and tan - moist to wet, increasing with depth - stiff to soft (RESIDUUM)
-									
-									
20.0	-20.0		6	SS	10				23.6

(continued)

REMARKS: _____



Northpark Boulevard

Alcoa, Tennessee

GEOservices Project # 21-16708

LOG OF BORING

B-2

SHEET 2 OF 3

DRILLER Danny King

ON-SITE REP.

BORING NO. / LOCATION

B-2

DRY ON COMPLETION ?

Yes

DATE November 7, 2016

SURFACE ELEV. FT.

REFUSAL: Yes DEPTH 49.2 FT.

ELEV. -49.2 FT.

SAMPLED 49.2 FT. 15.0 M

TOP OF ROCK DEPTH FT.

ELEV. FT.

BEGAN CORING DEPTH FT.

ELEV. FT.

FOOTAGE CORED (LF) FT.

BOTTOM OF HOLE DEPTH 49.2 FT.

ELEV. -49.2 FT.

BORING ADVANCED BY:

POWER AUGERING X

PROPOSED FFE: FT.

WATER LEVEL DATA (IF APPLICABLE)

COMPLETION: DEPTH Dry FT.

ELEV. FT.

AFTER 1 HRS: DEPTH TNP FT.

ELEV. FT.

AFTER 24 HRS: DEPTH TNP FT.

ELEV. FT.

STRATUM DEPTH	SAMPLE DEPTH		SAMPLE OR RUN NO.	SAMPLE TYPE	FIELD RESULTS		LABORATORY RESULTS			STRATUM DESCRIPTION
	FROM	TO			N-Value	Qu	LL	PI	%M	
	FT.	FT.								
-										(continued)
-										
-										
22.5	-22.5									
-										
-										
25.0	-25.0									
-										
-										
27.5	-27.5									
-										
-										
30.0	-30.0									
-										
-										
32.5	-32.5									
-										
-										
35.0	-35.0									
-										
-										
37.5	-37.5									
-										
-										
40.0	-40.0									

(continued)

REMARKS: _____



Northpark Boulevard

Alcoa, Tennessee

GEOServices Project # 21-16708

LOG OF BORING

B-2

SHEET 3 OF 3

DRILLER Danny King

ON-SITE REP.

BORING NO. / LOCATION

B-2

DRY ON COMPLETION ?

Yes

DATE November 7, 2016 SURFACE ELEV. FT.
 REFUSAL: Yes DEPTH 49.2 FT. ELEV. -49.2 FT.
 SAMPLED 49.2 FT. 15.0 M
 TOP OF ROCK DEPTH FT. ELEV. FT.
 BEGAN CORING DEPTH FT. ELEV. FT.
 FOOTAGE CORED (LF) FT.
 BOTTOM OF HOLE DEPTH 49.2 FT. ELEV. -49.2 FT.

WATER LEVEL DATA (IF APPLICABLE)
 COMPLETION: DEPTH Dry FT.
 ELEV. FT.
 AFTER 1 HRS: DEPTH TNP FT.
 ELEV. FT.
 AFTER 24 HRS: DEPTH TNP FT.
 ELEV. FT.

BORING ADVANCED BY:

POWER AUGERING X

PROPOSED FFE: FT.

STRATUM DEPTH	SAMPLE DEPTH		SAMPLE OR RUN NO.	SAMPLE TYPE	FIELD RESULTS		LABORATORY RESULTS			STRATUM DESCRIPTION
	FROM	TO			N-Value	Qu	LL	PI	%M	
FT. ELEV.	FT.	FT.								
-										(continued)
-										-
-										-
42.5	-42.5									-
-										-
-										-
45.0	-45.0	43.5	45.0	11	SS	4				21.7 Fat CLAY (CH) - reddish brown and tan - moist to wet, increasing with depth - stiff to soft (RESIDUUM)
-										-
-										-
47.5	-47.5									-
-										-
50.0	-50.0	48.5	49.1	12	SS	50/1"				19.5 Auger Refusal at 49.2 Feet
-										-
-										-
52.5	-52.5									-
-										-
55.0	-55.0									-
-										-
57.5	-57.5									-
-										-
60.0	-60.0									-

REMARKS: _____



Northpark Boulevard

Alcoa, Tennessee

GEOServices Project # 21-16708

LOG OF BORING

B-3

SHEET 1 OF 2

DRILLER Danny King

ON-SITE REP.

Yes

BORING NO. / LOCATION

B-3

DRY ON COMPLETION ?

DATE November 7, 2016 SURFACE ELEV. FT.
 REFUSAL: Yes DEPTH 42.2 FT. ELEV. -42.2 FT.
 SAMPLED 42.2 FT. 12.9 M
 TOP OF ROCK DEPTH FT. ELEV. FT.
 BEGAN CORING DEPTH FT. ELEV. FT.
 FOOTAGE CORED (LF) FT.
 BOTTOM OF HOLE DEPTH 42.2 FT. ELEV. -42.2 FT.

WATER LEVEL DATA (IF APPLICABLE)
 COMPLETION: DEPTH Dry FT.
 ELEV. FT.
 AFTER 1 HRS: DEPTH TNP FT.
 ELEV. FT.
 AFTER 24 HRS: DEPTH TNP FT.
 ELEV. FT.

BORING ADVANCED BY:

POWER AUGERING X

PROPOSED FFE: FT.

STRATUM DEPTH	SAMPLE DEPTH		SAMPLE OR RUN NO.	SAMPLE TYPE	FIELD RESULTS		LABORATORY RESULTS			STRATUM DESCRIPTION
	FROM	TO			N-Value	Qu	LL	PI	%M	
	FT.	FT.								
—										Topsoil (2 Inches)
—										
—										
—										
2.5	-2.5									
—										
—										
—										
5.0	-5.0									
—										
—										
—										
7.5	-7.5									
—										
—										
—										
10.0	-10.0									
—										
—										
12.5	-12.5									
—										
—										
15.0	-15.0									
—										
—										
17.5	-17.5									
—										
—										
20.0	-20.0									

(continued)

REMARKS:



GEOservices, LLC-Geotechnical and Materials Engineers

Northpark Boulevard

Alcoa, Tennessee

GEOservices Project # 21-16708

LOG OF BORING

B-3

SHEET 2 OF 2

DRILLER Danny King

ON-SITE REP.

BORING NO. / LOCATION

B-3

DRY ON COMPLETION ?

Yes

DATE November 7, 2016

SURFACE ELEV. FT.

REFUSAL: Yes DEPTH 42.2 FT.

ELEV. -42.2 FT.

SAMPLED 42.2 FT.

12.9 M

TOP OF ROCK DEPTH FT.

FT.

ELEV. FT.

BEGAN CORING DEPTH FT.

FT.

ELEV. FT.

FOOTAGE CORED (LF) FT.

BOTTOM OF HOLE DEPTH 42.2 FT.

ELEV. -42.2 FT.

BORING ADVANCED BY:

POWER AUGERING X

WATER LEVEL DATA (IF APPLICABLE)

COMPLETION: DEPTH Dry FT.

ELEV. FT.

AFTER 1 HRS: DEPTH TNP FT.

ELEV. FT.

AFTER 24 HRS: DEPTH TNP FT.

ELEV. FT.

PROPOSED FFE: FT.

STRATUM DEPTH FT. ELEV.	SAMPLE DEPTH		SAMPLE OR RUN NO.	SAMPLE TYPE	FIELD RESULTS		LABORATORY RESULTS			STRATUM DESCRIPTION
	FROM	TO			N-Value	Qu	LL	PI	%M	
	FT.	FT.								
-										(continued)
22.5	-22.5									
25.0	-25.0									
27.5	-27.5									
30.0	-30.0									
32.5	-32.5									
35.0	-35.0									
37.5	-37.5									
40.0	-40.0									

Auger Refusal at 42.2 Feet

REMARKS:



GEOservices, LLC-Geotechnical and Materials Engineers

Northpark Building 4, 5, & 10
GEOservices Project No. 21-16708
November 9, 2016

SOIL DATA SUMMARY

Borehole Number	Sample Number	Depth (ft)	Moisture Content	Soil Properties				Soil Type
				GRANULARITY	CONSISTENCY	STRENGTH	STABILITY	
B-1	1	1.0-2.5'	17.5%					
	2	3.5-5.0'	16.7%	33	16	17		CL
	3	6.0-7.5'	16.1%					
	4	8.5-10.0'	17.7%					
	5	13.5-15.0'	26.8%					
	6	18.5-20.0'	37.3%					
	7	23.5-25.0'	38.7%					
	8	28.5-30.0'	44.8%					
	9	33.5-35.0'	43.9%					
	10	38.5-40.0'	47.0%					
	11	43.5-45.0'	44.7%					
	12	48.5-50.0'	38.3%					
B-2	1	1.0-2.5'	22.7%					
	2	3.5-5.0'	12.7%	40	20	21		CL
	3	6.0-7.5'	26.8%					
	4	8.5-10.0'	29.7%					
	5	13.5-15.0'	23.0%					
	6	18.5-20.0'	23.6%					
	7	23.5-25.0'	37.7%					
	8	28.5-30.0'	37.2%					
	9	33.5-35.0'	30.7%					
	10	38.5-40.0'	31.4%					
	11	43.5-45.0'	21.7%					
	12	48.5-50.0'	19.5%					
B-3	1	1.0-2.5'	21.4%	49	22	27		CL
	2	3.5-5.0'	26.2%					
	3	6.0-7.5'	36.5%					
	4	8.5-10.0'	47.0%					
	5	13.5-15.0'	46.2%					
	6	18.5-20.0'	40.7%					
	7	23.5-25.0'	44.1%					
	8	28.5-30.0'	28.1%					
	9	33.5-35.0'	44.7%					

GEOservices, LLC - 2561 Willow Point Way Knoxville, Tennessee, 37931 - Phone: (865) 573-6130

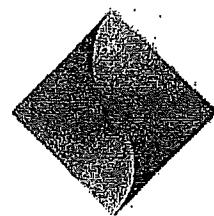


North Park Services Project No. 21-1671 November 14, 2016

SOIL DATA SUMMARY

EXHIBIT B

Case 3:18-cv-00482-TRM-HBG Document 1 Filed 11/12/18 Page 45 of 102 PageID #: 45



SELECTIVE®

POLICY DOCUMENT

S 201356005

INSURED'S COPY

Issued by The Stock Insurance Company

Policy Number

S: 2013560

SELECTIVE INSURANCE COMPANY OF SOUTH CAROLINA
3426 TORINGDON WAY, CHARLOTTE, NC 28277

COMMERCIAL POLICY INFORMATION PAGE

Named Insured and Address JOHN R FISER INC, JRF PROPERTIES, LLC DBA THE ADAIR COMPANY, JRF PROPERTIES, LLC DBA BROADWAY SQUARE COMPANY, JRF 132 SHERLAKE LN KNOXVILLE, TN 37922-2307 CONTINUED ON SCHEDULE: IL-7041	Policy Period: From: DECEMBER 31, 2016 To: DECEMBER 31, 2017 1201 A.M Standard Time At Location of Designated Premises.
Named Insured is: CORPORATION	Producer Number: 00-41015-00000
Producer: TIS INSURANCE SERVICES INC TENNESSEE	
<p>Schedule of Coverage Schedule Effective Date: OCTOBER 19, 2017</p> <p>COMMERCIAL GENERAL LIABILITY COVERAGE COMMERCIAL AUTOMOBILE COVERAGE COMMERCIAL INLAND MARINE COVERAGE COMMERCIAL UMBRELLA COVERAGE COMMERCIAL OUTPUT PROGRAM</p>	
Date Issued: OCTOBER 24, 2017	
Issuing office: SOUTHERN REGION	

IL-7025A(11/89)

Policy Effective Date
DECEMBER 31, 2016

Policy Number
S 2013560

NAMED INSURED EXTENSION SCHEDULE

COMPLETE NAMED INSURED:

JOHN R FISER INC, JRF PROPERTIES, LLC DBA THE ADAIR COMPANY,
JRF PROPERTIES, LLC DBA BROADWAY SQUARE COMPANY, JRF
PROPERTIES LLC, TWO-TWENTY COMPANY, CEDAR BLUFF COMPANY,
BAGLEY LAND COMPANY, FISER- THORTON LLC, F&T PROPERTIES,
OAK RIDGE PROPERTIES, FISER FAMILY TRUST FBO CAROLINE FISER
OSBORNE UWO JOHN R. FISER, CAROLINE FISER OSBORNE TRUST UTA
DATED 02/20/76, DAVID B. FISER TRUST UTA DATED 02/20/76,
WALKER SPRINGS COMPANY, H V PROPERTIES, FISER FAMILY TRUST
FBO DAVID B. FISER UWO JOHN R. FISER, FAULKNER PROPERTIES
GENERAL PARTNERSHIP, KLOTE PROPERTIES, THIRD CREEK
PROPERTIES LLC, KNOX-FI ONE LLC, FARRAGUT POINTE
PROPERTIES, CHEROKEE CROSSING, LLC, KNOXFI TWO LLC,
JEFFERSON HOLDINGS LLC, KELLER BEND PROPERTIES, INC, KNOX
ABODES LLC, JRF PROPERTIES, LLC DBA BROADWAY CROSSING, LLC,
2400 MAREMONT LLC, JRF PROPERTIES LLC DBA FISER WAREHOUSE
TEXAS AVENUE PROPERTIES JOHN R FISER 1976 TRUST

SCHEDULE OF COVERAGES COMMERCIAL OUTPUT PROGRAM

POLICY NUMBER: S 2013560

AAIS
CO 50 00 04 14

	Limit of Insurance
Catastrophe Limit: The most "we" pay for any combination of or total of losses arising under one or more coverages in any one occurrence is:	\$126,690,735

PROPERTY COVERAGE PART

LIMITS

Separate Building & BPP Blanket Limits

Building Property Limit - The most

"we" pay for loss at any one "covered location" is:

Business Personal Property Limit - The most

"we" pay for loss at any one "covered location" is:

or

Combined Blanket Limit - The most "we" pay for loss at any one "covered location" is:

\$111,743,662

Blanket Limit(s) shown above do not include any Scheduled locations.

Scheduled Locations. Refer to CO 50 01.

DEDUCTIBLE

\$5,000

PROPERTY COVERAGE EXTENSIONS

Consequential Loss

INCLUDED IN BPP LIMIT

\$100,000

Debris Removal Additional Limit

365 DAYS

Emergency Removal

\$5,000

Emergency Removal Expense

Fraud and Deceit

INCLUDED IN BPP LIMIT

Damage From Theft

INCLUDED IN PROP LIMIT

Off Premises Utility Service Interruption

\$50,000

Overhead Transmission Lines Excluded

Covered Utility:

Power

Gas

Telecommunications

Water

Tenants Building Glass Liability

INCLUDED IN BPP LIMIT

PROPERTY SUPPLEMENTAL COVERAGES

Additional Costs	\$250,000
Business Personal Property-Common Property Within Owned Buildings	\$25,000
Business Personal Property Seasonal Increase	25%
Brands or Labels Expense	\$50,000
Crime Related Supplemental Coverages	
Employee Theft (incl. Employee Benefit Plans)	\$100,000
Forgery Or Alterations	\$100,000
Forged Credit Card Written Instrument	\$50,000
Money and Securities-Inside the Premises	\$25,000
Money and Securities-Outside the Premises	\$15,000
Money Orders & Counterfeit Paper Currency	\$5,000
Expediting Expenses	\$50,000
Fire Department Service Charges	\$25,000
Inventory and Appraisal Expense	\$50,000
Legal Liability-Building	\$100,000
Lock Replacement Coverage	\$2,500
Members & Guests Property	\$50,000
Non-Owned Detached Trailers	\$50,000
Ordinance or Law (Demolition of Undamaged Parts of Buildings)	INCLUDED IN BLDG LIMIT
Ordinance or Law (Increased Cost to Repair/ Cost to Demolish and Clear Site)	\$1,000,000
Ornamental Display Gardens & Landscape Displays	\$25,000
Outdoor Property	\$75,000
Personal Effects	\$25,000
Personal Property of Others-Valuation	UP TO REPL COST
Pollutant Cleanup And Removal	\$50,000
Property Off Premises	\$100,000
Recharge of Fire Extinguishing Equipment	\$50,000
Rewards (Not available in New York)	\$25,000
Sewer Backup and Water Below the Surface	\$100,000
Trees, Shrubs, and Plants	\$50,000
Any One Item Limit	\$5,000
Underground Pipes, Piling, Bridges and Roadways	\$250,000

EMERGENCY SERVICES & GOVERNMENTAL SUPPLEMENTAL COVERAGES

Automated External Defibrillators	NOT APPLICABLE
Canine Coverage-Any One Canine	NOT APPLICABLE
Canine Coverage-Any One Policy Year	NOT APPLICABLE
Confiscated Property-Any One Policy Year	NOT APPLICABLE
Grave Markers and Headstones-Any One Occurrence	NOT APPLICABLE
Grave Markers and Headstones-Any One Policy Year	NOT APPLICABLE
Outdoor Fences Limitation	NOT APPLICABLE
Outdoor Signs Limitation	NOT APPLICABLE
Protective Safeguards Upgrade	NOT APPLICABLE
Roof Protection-Per Building Any One Policy Year	NOT APPLICABLE
Specified Appurtenant Structures	NOT APPLICABLE
Underground Fiber Optic Cable-Any One Occurrence	NOT APPLICABLE
Underground Fiber Optic Cable-Any One Policy Year	NOT APPLICABLE

GOLF COURSE / COUNTRY CLUB SUPPLEMENTAL COVERAGES

Additional Property Covered-Golf Course/CC	NOT APPLICABLE
Business Personal Property of Golf Professionals	NOT APPLICABLE
Swimming Pools	NOT APPLICABLE
Theft of Telephone or Data Line Services.	NOT APPLICABLE

COMM-UNITY® OF FAITH SUPPLEMENTAL COVERAGES

Automated External Defibrillators.	NOT APPLICABLE
Donated Automobiles Held for Sale. (Does not apply in Virginia or Massachusetts)	NOT APPLICABLE
Dwelling Appurtenances	NOT APPLICABLE
Dwelling Personal Property	NOT APPLICABLE
Grave Markers and Headstones-Any One Occurrence	NOT APPLICABLE
Grave Markers and Headstones-Any One Policy Year	NOT APPLICABLE
Personal Property and Personal Effects of Clergy	NOT APPLICABLE

RESORT HOTELS SUPPLEMENTAL COVERAGES

Additional Property Covered-Golf Course/CC	NOT APPLICABLE
Business Personal Property of Golf Professionals	NOT APPLICABLE
Concierge Services-Any One Person	NOT APPLICABLE
Concierge Services-Any One Occurrence	NOT APPLICABLE
Electronic Security Keying Systems	NOT APPLICABLE
Swimming Pools	NOT APPLICABLE
Theft of Telephone or Data Line Services	NOT APPLICABLE

SCHOOLS SUPPLEMENTAL COVERAGES

Automated External Defibrillators	NOT APPLICABLE
Harvested Crops	NOT APPLICABLE
Personal Effects of Students-Any One Student	NOT APPLICABLE
Personal Effects of Students-Any One Occurrence	NOT APPLICABLE
Outdoor Fences Limitation	NOT APPLICABLE
Outdoor Signs Limitation	NOT APPLICABLE
Roof Protection-Per Building Any One Year	NOT APPLICABLE
Specified Appurtenant Structures	NOT APPLICABLE
Underground Fiber Optic Cable-Any One Occurrence	NOT APPLICABLE
Underground Fiber Optic Cable-Any One Policy Year	NOT APPLICABLE

SOCIAL SERVICES SUPPLEMENTAL COVERAGES

Automated External Defibrillators	NOT APPLICABLE
Canine Coverage-Any One Canine	NOT APPLICABLE
Canine Coverage-Any One Policy Year	NOT APPLICABLE
Damage to Property of Home Care Providers	NOT APPLICABLE
Mobile Medical Equipment	NOT APPLICABLE
Property of Residents or Clients- Any One Resident/Client	NOT APPLICABLE
Property of Residents or Clients- Any One Occurrence	NOT APPLICABLE
Theft of Resident's or Client's Money and Securities- Any One Resident/Client	NOT APPLICABLE
Theft of Resident's or Client's Money and Securities- Any One Occurrence	NOT APPLICABLE

ASSISTED LIVING FACILITIES SUPPLEMENTAL COVERAGES

Automated External Defibrillators	NOT APPLICABLE
Mobile Medical Equipment	NOT APPLICABLE
Property of Residents-Any One Resident	NOT APPLICABLE
Property of Residents-Any One Occurrence	NOT APPLICABLE
Theft of Resident's Money and Securities- Any One Resident	NOT APPLICABLE
Theft of Resident's Money and Securities- Any One Occurrence	NOT APPLICABLE

SUPPLEMENTAL MARINE COVERAGES

Accounts Receivable	\$100,000
Electrical or Magnetic Disturbance of Computers	INCLUDED IN BPP LIMIT
Power Supply Disturbance of Computers	INCLUDED IN BPP LIMIT
Virus and Hacking Coverage	
Limit any one occurrence	\$25,000
Limit any 12 month period	\$50,000
Fine Arts	\$100,000
Off Premises Computers	\$25,000
Property In Transit	\$50,000
Property On Exhibition	\$50,000
Sales Representative Samples	\$50,000
Software Storage	\$50,000
Valuable Papers	\$100,000

EMERGENCY SERVICES & GOVERNMENTAL SUPPLEMENTAL MARINE COVERAGES

Commandeered Property	NOT APPLICABLE
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ADDITIONAL PROPERTY SUBJECT TO LIMITATIONS

Furs (theft)	\$10,000
Jewelry (theft)	\$10,000
Stamps, Tickets, Letters of Credit	\$5,000

PROPERTY COVERAGE OPTIONS (check if applicable)

<input type="checkbox"/> Actual Cash Value Applies	
<input type="checkbox"/> Automatic Increase	
<input checked="" type="checkbox"/> Scheduled Locations	
Newly Built or Acquired Buildings	\$5,000,000
Personal Property-Acquired Locations	\$2,000,000
Locations "You" Elect Not To Describe	\$100,000
Coinsurance	NONE

OPTIONAL PROPERTY COVERAGES AND ENDORSEMENTS (check if applicable)

<input type="checkbox"/> Donated Property Held For Sale	
<input type="checkbox"/> Earthquake Sprinkler Leakage	
<input type="checkbox"/> Functional Replacement Cost	
<input type="checkbox"/> Golf Club Professional Replacement Expense (Not available in IL, MO and VA)	
<input type="checkbox"/> Guaranteed Replacement Cost	
<input checked="" type="checkbox"/> Instalment Sales	\$100,000
<input checked="" type="checkbox"/> Limited Fungus And Related Perils Property Coverage The most "we" pay for all losses at all "covered locations" is:	\$50,000
<input checked="" type="checkbox"/> Loss Payable Options	

Off-Site Server Coverage and Interruption of Web Site.
 Supplemental Marine Coverage
 Off site server limit
 Off site server Virus and Hacking limit
 12 month Virus and Hacking period limit
 Deductible Amount
 Denial of Service Attack Excluded
 Property Excluded
 Refrigeration Breakdown Property In Transit Supplemental
 Marine Coverage Extension-Owner's Cargo Only
 Reporting Conditions
 Key Employee Replacement Expense
 (Not available in IL, MO and VA)
 Stated Value Endorsement
 Transit and Location Property Coverage-Outside the
 Territorial Limits
 Transit Backhaul
 Theft Exclusion
 Vacancy or Unoccupancy Coverage
 Vehicle Coverage

INCOME COVERAGE PART

COVERAGE (check one)

Income Coverage Does Not Apply
 Earnings, Rents, and Extra Expense
 Earnings and Extra Expense
 Rents and Extra Expense
 Extra Expense Only

LIMIT

Income Coverage Limit-The most "we" pay
 for loss at any one "covered location" is: **\$11,591,073**
 The Income Limit shown above does not
 include any Scheduled locations.
 Scheduled Locations. Refer to CO 50 01.

DEDUCTIBLE

WAITING PERIOD - **72HRS**

INCOME COVERAGE EXTENSIONS

Interruption By Civil Authority	30 DAYS
Period of Loss Extension	180 DAYS

SUPPLEMENTAL INCOME COVERAGES

Auto Physical Damage	\$25,000
Computer Virus and Hacking	
Limit any one occurrence	\$25,000
Limit any 12 month period	\$75,000
Waiting Period	12 HOURS
Contract Penalty	
Limit any one occurrence	\$100,000
Limit any 12 month period	\$250,000
Dependent Locations	\$250,000
Food Contamination Shutdown	\$50,000
Ingress Or Egress	\$50,000
Off Premises Utility Service Interruption	\$25,000
Service Interruption Waiting Period	12 HOURS
<input type="checkbox"/> Overhead Transmission Lines Excluded	
Covered Utility:	
<input checked="" type="checkbox"/> Power	<input checked="" type="checkbox"/> Gas
<input checked="" type="checkbox"/> Telecommunications	<input checked="" type="checkbox"/> Water
Pollutants Cleanup and Removal	\$25,000
Property In Transit, On Exhibition, or Custody of Sales Representatives	\$25,000
Realty Tax	\$50,000
Sewer Backup & Water Below the Surface	\$100,000

EMERGENCY SERVICES & GOVERNMENTAL SUPPLEMENTAL INCOME COVERAGES

Emergency Vacating Expense	NOT APPLICABLE
GOLF COURSE / COUNTRY CLUB SUPPLEMENTAL INCOME COVERAGES	

Communicable Disease Extra Expense	NOT APPLICABLE
Customer Inconvenience Remuneration	NOT APPLICABLE
Emergency Vacating and Relocating Expense	NOT APPLICABLE

COMMUNITY® OF FAITH SUPPLEMENTAL INCOME COVERAGES

Communicable Disease Extra Expense	NOT APPLICABLE
Emergency Vacating Expense	NOT APPLICABLE
Terrorism Travel Expense	NOT APPLICABLE

RESORT HOTELS SUPPLEMENTAL INCOME COVERAGES

Communicable Disease Extra Expense	NOT APPLICABLE
Customer Inconvenience Remuneration	NOT APPLICABLE
Emergency Vacating and Relocating Expense	NOT APPLICABLE

SCHOOLS SUPPLEMENTAL INCOME COVERAGES

Communicable Disease Extra Expense	NOT APPLICABLE
Emergency Vacating Expense	NOT APPLICABLE
Loss of Income-Planned Events	NOT APPLICABLE
Violent Event Extra Expense-Any One Policy Year	

SOCIAL SERVICES SUPPLEMENTAL INCOME COVERAGES

Communicable Disease Extra Expense	NOT APPLICABLE
Emergency Vacating Expense	NOT APPLICABLE
Meeting Space Expense	NOT APPLICABLE
Relocation Fees	NOT APPLICABLE
Temporary Room Vacancy Income-Any One	NOT APPLICABLE
Accident/Illness Involving One Resident/Client	NOT APPLICABLE
Temporary Room Vacancy Income-Any One Policy Year	NOT APPLICABLE
Terrorism Travel Expense	NOT APPLICABLE

ASSISTED LIVING FACILITIES SUPPLEMENTAL INCOME COVERAGES

Communicable Disease Extra Expense	NOT APPLICABLE
Emergency Vacating Expense	NOT APPLICABLE
Terrorism Travel Expense	NOT APPLICABLE

INCOME COVERAGE OPTIONS (check if applicable)

<input checked="" type="checkbox"/> Scheduled Locations	
Newly Built or Acquired Locations	\$500,000
Coinsurance	NONE
<input type="checkbox"/> Monthly Limitation	
<input type="checkbox"/> Extra Expense Recovery Period Percentages	
OPTIONAL INCOME COVERAGES AND ENDORSEMENTS (check if applicable)	
<input type="checkbox"/> Denial of Service Attack-On-site & Off-site Server	
<input type="checkbox"/> Expanded Restoration Period-Extra Expense	
<input type="checkbox"/> Income Coverage from Dependent Locations- Separate Limits	
<input type="checkbox"/> Income From Dependent Domestic & Foreign Locations	
<input checked="" type="checkbox"/> Limited Fungus And Related Perils Income	
Coverage: Time Limitation	30 DAYS
<input type="checkbox"/> Off Site Server Coverage & Interruption of Web Site	

 Interruption of Web Site
 Interruption of Web Site Virus & Hacking
 12 month Virus and Hacking period limit
 Waiting Period

Coverage Limitation

<input type="checkbox"/> Denial of Service Attack Excluded
<input type="checkbox"/> Ordinary Payroll Limitation
<input type="checkbox"/> Ordinary Payroll Exclusion
<input type="checkbox"/> Power, Heat & Refrigeration Exclusion
<input type="checkbox"/> Research and Development Projects- Income Coverage
<input type="checkbox"/> Seasonal Leases
<input type="checkbox"/> Transit and Location Property & Income Coverage-Outside the Territorial Limits
<input type="checkbox"/> Tuition Coverage Limit-The most "we" pay for loss at any one "covered location" is:

EQUIPMENT BREAKDOWN COVERAGE PART

 Not Covered**EQUIPMENT BREAKDOWN COVERAGE LIMITS**

Property Damage

FOLLOWS PROPERTY COVERAGES

Income Coverage

FOLLOWS INCOME COVERAGES

Income Coverages

Period of Loss Extension

180. DAYS

Coverage Options (check one)

- Earnings, Rents, and Extra Expense
- Earnings and Extra Expense
- Rents and Extra Expense
- Extra Expense Only

EQUIPMENT BREAKDOWN DEDUCTIBLES

Combined Property and Income Coverages

FOLLOWS PROPERTY DEDUCTIBLE

Property Coverages

NOT APPLICABLE

Income Coverages

NOT APPLICABLE

Other (describe)

EQUIPMENT BREAKDOWN COVERAGE EXTENSIONS

Animal Coverage

\$250,000

Expediting Expenses

\$250,000

Pollutants

\$250,000

Ordinance or Law Undamaged Parts of Buildings

FOLLOWS PROPERTY COVERAGES

Ordinance or Law Increased Cost to Repair /

FOLLOWS PROPERTY COVERAGES

Cost to Demolish and Clear Site

FOLLOWS EB INCOME COVERAGES

Off Premises Utility Service Interruption

COVERED

Defense Costs

Limited Fungus And Related Perils Property Damage

\$50,000

Coverage. The most "we" pay for all losses at
all "covered locations" is: Limited Fungus And Related Perils Income
Coverage. Time Limitation:

30. DAYS

OTHER CONDITIONS

SPOILAGE COVERAGE PART

Not Covered:

Spoilage Catastrophe Limit - The most "we" pay for loss in any one occurrence is:

BLANKET SPOILAGE COVERAGE

Location Limit - The most "we" pay for loss at any one "covered location" is:

Blanket Limit shown above does not include any Scheduled locations.

SCHEDULED SPOILAGE COVERAGE. Refer to CO.50.01.

Spoilage Deductible

Additional Conditions (check if applicable)

- Selling Price Valuation
- Refrigeration, Maintenance, or Service Agreement

PERILS COVERED

- Breakdown, Malfunction, or Failure
(Equipment Breakdown)
- Refrigerant Contamination
(Equipment Breakdown)
- Refrigerant Contamination
(Other Causes Of Loss)
- Power Disruption (Equipment Breakdown)
- Power Disruption (Other Causes Of Loss)

Endorsement Number
CP0011Policy Number
S 2013560SELECTIVE INSURANCE COMPANY OF SOUTH CAROLINA
3426 TORINGDON WAY, CHARLOTTE, NC 28277

POLICY CHANGES

Named Insured and Address JOHN R. FISER INC, JRF PROPERTIES, LLC DBA THE ADAIR COMPANY, JRF PROPERTIES, LLC DBA BROADWAY SQUARE COMPANY, JRF 132 SHERLAKE LN KNOXVILLE, TN 37922-2307 CONTINUED ON SCHEDULE: IL-7041.	Policy Period From: DECEMBER 31, 2016 To: DECEMBER 31, 2017
	Endorsement Effective Date: OCTOBER 19, 2017
Producer: TIS INSURANCE SERVICES INC	Producer Number: 00-41015-00000

COVERAGE PART AFFECTED COMMERCIAL OUTPUT PROGRAM COVERAGE PART

THIS ENDORSEMENT CHANGES THE POLICY. PLEASE READ IT CAREFULLY.

THE FOLLOWING COP FORM(S) AND ENDORSEMENT(S) ARE CHANGED:
IL7025A 11/89 COMMERCIAL POLICY INFORMATION PAGE
IL7028 03/94 POLICY CHANGES ENDORSEMENT

TOTAL COP ADDL/RETURN PREMIUM: 753.00

Forms and Endorsements: IL 70 25A 1189 COMMERCIAL POLICY INFORMATION PAGE CO 50 00 0414 SCHEDULE OF COVERAGES - COP CO 50 23 1208 COMMERCIAL OUTPUT PROGRAM DECLARATION CL 01 00 0399 COMMON POLICY CONDITIONS CONTINUED ON SCHEDULE: IL-7035	Additional Endorsement Premium \$753.00
NOTICE TO POLICYHOLDER: All the forms and endorsements contained in this coverage part as of the Endorsement Effective Date are listed above. Forms and endorsements added to this policy after this date will appear on another Policy Changes endorsement. Please read your policy and all "Policy Changes" carefully.	REG - 1 (This premium may be subject to adjustment.)
Date Issued: OCTOBER 24, 2017 Issuing Office: SOUTHERN REGION	Authorized Representative: _____

Policy Number
S 2013560

COMMERCIAL POLICY FORMS AND ENDORSEMENT SCHEDULE

Policy Effective Date: DECEMBER 31, 2016

Schedule Effective Date: OCTOBER 19, 2017

CONTINUATION OF FORMS FOR ENDORSEMENT NUMBER CP0011

CL 01 18 0101	AMENDATORY ENDORSEMENT-TN
CL 06 00 0115	CERTIFIED TERRORISM LOSSES
CL 07 00 1006	VIRUS OR BACTERIA EXCLUSION
CO 10 00 1002	COP-PROPERTY COVERAGE PART
CO 10 01 0402	COP-INCOME COVERAGE PART
CO 10 03 0402	EQUIPMENT BREAKDOWN COVERAGE PART
CO 10 65 0402	PROTECTIVE DEVICES SCHEDULE
CO 10 72 0402	LOSS PAYABLE SCHEDULE
CO 12 27 0502	SCHEDULED LOCATIONS ENDORSEMENT
CO 12 32 0402	LOSS PAYABLE OPTIONS
CO 12 33 0402	PREMIUM PAYMENTS
CO 12 38 0402	PROTECTIVE DEVICES ENDORSEMENTS
CO 12 80 0402	PROPERTY AND INCOME COVERAGE DEDUCTIBLE
CO 12 81 0402	WAITING PERIOD-INCOME COVERAGE
CO 12 87 0402	INSTALLMENT SALES COVERAGE
CO 12 93 1103	LIMITED FUNGUS & RELATED PERILS COV
CO 12 94 1103	LIMITED FUNGUS & REL PERILS COV-EQ/BK
CO 50 01 0414	LOCATION SCHEDULE
CO 50 02 0414	COP PREMIER PAC ENHANCEMENT ENDT
CO 50 09 0807	COP LEGAL LIABILITY-BUILDING
CO 50 10 0807	COP EB OFF PREM UTIL SERV INTERRUPT
CO 50 11 0807	COP EB DESTRUCTIVE TESTING EXCLUSION
CO 50 12 0807	COP EB ANIMALS COVERAGE ENDORSEMENT
CO 50 14 0807	ASBESTOS EXCLUSIÓN
CO 50 19 0907	MORTGAGE HOLDERS SCHEDULE
IL 09 85A 0115	DISCL PURSUANT TO TERR RISK INS ACT
IL 70 01 0188	ADDITIONAL NAMED INSURED ENDORSE
IN 01 29 0116	NOTICE - OFFER OF TERR COV AND REJECTION
IN 01 99 0406	IMPORTANT NOTICE-EQUIP B/D COV INSP SERV
IN 03 29 0310	IMPORTANT NOTICE TO POLICYHOLDERS
IN 03 80 0414	IMPT NOTICE POLICYHOLDERS COP-BROADENING

NOTICE TO POLICYHOLDER: All the forms and endorsements contained in this policy as of the "Schedule Effective Date" are listed above. Forms and endorsements added to the policy after this date will appear on a "Policy Changes" endorsement. Please read your policy and all "Policy Changes" carefully.

NOTE: All applicable "IL" endorsements will be attached in the Common Section of the policy.

Previous Policy Number S 2013560	Policy Number S 2013560
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COMMERCIAL OUTPUT PROGRAM DECLARATION

Policy Effective Date: DECEMBER 31, 2016	Coverage Effective Date: OCTOBER 19, 2017
Business of Named Insured: LESSORS RISK Insurance is provided only for those coverages for which a specific limit is shown on the attached Schedule Of Coverages.	

COVERAGE SCHEDULE

Refer to Schedule Of Coverages	
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Forms and Endorsements: Refer to "Commercial Policy Forms and Endorsement Schedule"	Premium Amount \$225,394.00
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CO-5023 (12/08)

LOCATION SCHEDULE

AAIS

CO 50 01 04 14

POLICY NUMBER: S 2013560

(The entries required to complete this endorsement will be shown below or on the "schedule of coverages".)

Coverage provided by the Commercial Output Program coverage parts applies only to the "covered locations" described below. Refer to "schedule of coverages" for applicable "limits", additional coverages, and, if applicable, coinsurance percentage. Any covered property described below that is shown as Scheduled is not part of any blanket coverage "limit".

SCHEDULE

Loc. No.	Bldg. No.	Covered Property (describe)	Limit	Blanket Type or Scheduled	Valuation
001	001	BUILDING	\$280,227	BLDG BPP	RC
001	001	INCOME	\$30,941	INCOME	
002	001	BUILDING	\$822,785	BLDG BPP	RC
002	001	INCOME	\$98,070	INCOME	
003	001	BUILDING	\$11,300,000	BLDG BPP	RC
003	001	INCOME	\$1,399,629	INCOME	
004	001	BUILDING	\$1,050,000	BLDG BPP	RC
004	001	INCOME	\$68,735	INCOME	
005	001	BUILDING	\$1,075,433	BLDG BPP	RC
005	001	INCOME	\$100,827	INCOME	
006	001	BUILDING	\$733,915	BLDG BPP	RC
006	001	INCOME	\$78,311	INCOME	
007	001	BUILDING	\$700,945	BLDG BPP	RC
007	001	INCOME	\$41,099	INCOME	
008	001	BUILDING	\$1,037,696	BLDG BPP	RC
008	001	INCOME	\$99,372	INCOME	
009	001	BUILDING	\$1,169,848	BLDG BPP	RC
009	001	INCOME	\$132,324	INCOME	
010	001	BUILDING	\$1,169,848	BLDG BPP	RC
010	001	INCOME	\$102,626	INCOME	
011	001	BUILDING	\$1,490,940	BLDG BPP	RC
011	001	BUSINESS PERSONAL PROPERTY	\$119,340	BLDG BPP	RC
011	001	INCOME	\$90,228	INCOME	
011	002	BUILDING	\$650,300	BLDG BPP	RC
011	002	INCOME	\$52,024	INCOME	
012	001	BUILDING	\$1,512,619	BLDG BPP	RC
012	001	INCOME	\$176,816	INCOME	
013	001	BUILDING	\$1,023,870	BLDG BPP	RC
013	001	INCOME	\$120,983	INCOME	
014	001	BUILDING	\$1,395,708	BLDG BPP	RC
014	001	INCOME	\$172,313	INCOME	
015	001	BUILDING	\$5,037,550	BLDG BPP	RC
015	001	INCOME	\$1,017,241	INCOME	
016	001	BUILDING	\$2,200,000	BLDG BPP	RC
016	001	INCOME	\$386,777	INCOME	
017	001	BUILDING	\$2,000,000	BLDG BPP	RC
017	001	INCOME	\$319,524	INCOME	
018	001	BUILDING	\$1,661,183	BLDG BPP	RC
018	001	INCOME	\$207,515	INCOME	
019	001	BUILDING	\$1,397,055	BLDG BPP	RC
019	001	INCOME	\$153,038	INCOME	
020	001	BUILDING	\$536,158	BLDG BPP	RC
020	001	INCOME	\$37,500	INCOME	
021	001	BUILDING	\$1,268,064	BLDG BPP	RC

LOCATION SCHEDULE

AAIS

CO 50 01 04 14

POLICY NUMBER: s 2013560

(The entries required to complete this endorsement will be shown below or on the "schedule of coverages".)

Coverage provided by the Commercial Output Program coverage parts applies only to the "covered locations" described below. Refer to "schedule of coverages" for applicable "limits", "additional coverages", and if applicable, coinsurance percentage. Any covered property described below that is shown as Scheduled is not part of any blanket coverage "limit".

SCHEDULE

Loc. No.	Bldg. No.	Covered Property (describe)	Limit	Blanket Type or Scheduled	Valuation
021	001	INCOME	\$149,312	INCOME	
022	001	BUILDING	\$954,720	BLDG BPP	RC
022	001	INCOME	\$143,160	INCOME	
023	001	BUILDING	\$1,227,100	BLDG BPP	
023	001	INCOME	\$168,975	INCOME	
024	001	BUILDING	\$1,764,427	BLDG BPP	RC
024	001	INCOME	\$216,318	INCOME	
025	001	BUILDING	\$680,186	BLDG BPP	RC
025	001	INCOME	\$95,796	INCOME	
026	001	BUILDING	\$1,590,636	BLDG BPP	RC
026	001	INCOME	\$144,126	INCOME	
027	001	BUILDING	\$1,580,827	BLDG BPP	RC
027	001	INCOME	\$162,257	INCOME	
028	001	BUILDING	\$1,590,636	BLDG BPP	RC
028	001	INCOME	\$221,571	INCOME	
029	001	BUILDING	\$2,179,502	BLDG BPP	RC
029	001	INCOME	\$301,011	INCOME	
030	001	BUILDING	\$2,047,562	BLDG BPP	RC
030	001	INCOME	\$203,518	INCOME	
031	001	BUILDING	\$2,510,390	BLDG BPP	RC
031	001	INCOME	\$285,324	INCOME	
032	001	BUILDING	\$2,899,501	BLDG BPP	RC
032	001	INCOME	\$110,858	INCOME	
033	001	BUILDING	\$1,796,193	BLDG BPP	RC
033	001	INCOME	\$199,843	INCOME	
034	001	BUILDING	\$1,067,443	BLDG BPP	RC
034	001	INCOME	\$110,897	INCOME	
035	001	BUILDING	\$2,986,738	BLDG BPP	RC
035	001	INCOME	\$327,996	INCOME	
036	001	BUILDING	\$1,213,160	BLDG BPP	RC
036	001	INCOME	\$108,000	INCOME	
040	001	BUILDING	\$3,494,613	BLDG BPP	RC
040	001	INCOME	\$692,609	INCOME	
042	001	BUILDING	\$2,530,000	BLDG BPP	RC
042	001	INCOME	\$559,417	INCOME	
043	001	BUILDING	\$2,668,190	BLDG BPP	RC
043	001	INCOME	\$396,675	INCOME	
044	001	BUILDING	\$1,403,091	BLDG BPP	RC
044	001	INCOME	\$90,000	INCOME	
045	001	BUILDING	\$2,478,600	BLDG BPP	RC
045	001	INCOME	\$177,141	INCOME	
047	001	BUILDING	\$2,370,092	BLDG BPP	RC
047	001	INCOME	\$238,739	INCOME	
047	002	BUILDING	\$1	BLDG BPP	RC

LOCATION SCHEDULE

AAIS

CO 50 01 04 14

POLICY NUMBER: s 2013560

(The entries required to complete this endorsement will be shown below or on the "schedule of coverages".)

Coverage provided by the Commercial Output Program coverage parts applies only to the "covered locations" described below. Refer to "schedule of coverages" for applicable "limits", additional coverages, and, if applicable, coinsurance percentage. Any covered property described below that is shown as Scheduled is not part of any blanket coverage "limit".

SCHEDULE

Loc. No.	Bldg. No.	Covered Property (describe)	Limit	Blanket Type or Scheduled	Valuation
047	002	INCOME	\$260,590	INCOME	
050	001	BUILDING	\$1,500,000	BLDG BPP	RC
050	001	INCOME	\$302,341	INCOME	
051	001	BUILDING	\$1,025,570	BLDG BPP	RC
053	001	BUILDING	\$1,701,000	BLDG BPP	RC
053	001	INCOME	\$275,129	INCOME	
054	001	BUILDING	\$3,500,000	BLDG BPP	RC
054	001	INCOME	\$324,500	INCOME	
055	001	BUILDING	\$500,000	BLDG BPP	RC
055	001	INCOME	\$94,563	INCOME	
069	001	BUILDING	\$1,200,000	BLDG BPP	RC
069	001	INCOME	\$281,248	INCOME	
072	001	BUILDING	\$19,200,000	BLDG BPP	RC
072	001	INCOME	\$1,356,000		
073	001	BUILDING	\$2,450,000	BLDG BPP	RC
073	001	INCOME	\$63,266	INCOME	
074	001	BUILDING	\$2,000,000	SCHEDULED	RC

SCHEDULE OF COVERAGES DIFFERENCE IN CONDITIONS

POLICY NUMBER: S 2013560

AAIS
IM-78 05 07 07

(The entries required to complete this schedule will be shown below or on the "schedule of coverages".)

COVERAGES (check one)

Blanket Coverage
 Scheduled Locations Coverage (check one)
 Refer to Locations Schedule
 Schedule On File

TYPE OF COVERAGES (check one)

DIC Coverage
 DIC Coverage Excluding Property Perils

Property Policy Information

Insurer SELECTIVE INSURANCE COMPANY OF SOUTH CAROLINA

Policy Number S 2013560

Excess Coverage (check if applicable)

Excess coverage for "earthquake"
 Excess coverage for "flood"

National Flood Insurance Program (if applicable)

Policy Number NOT APPLICABLE

EARTHQUAKE LIMITS

If Income Coverage is part of this policy and a loss is caused by or results from an earthquake, the "limit" for Income Coverage is part of and not in addition to the Earthquake Limits indicated below.

Occurrence Limit — The earthquake "occurrence limit" is: \$10,000,000

Aggregate Limit — The earthquake "aggregate limit" is: \$10,000,000

Catastrophe Limit — The earthquake "catastrophe limit" is: \$10,000,000

FLOOD LIMITS

If Income Coverage is part of this policy and a loss is caused by or results from a "flood", the "limit" for Income Coverage is part of and not in addition to the Flood Limits indicated below.

Occurrence Limit — The "flood" "occurrence limit" is: NOT COVERED

Aggregate Limit — The "flood" "aggregate limit" is: NOT COVERED

Catastrophe Limit — The "flood" "catastrophe limit" is: NOT COVERED

**ALL OTHER COVERED PERILS LIMITS
(Excluding Earthquake And Flood)**

Occurrence Limit — The "occurrence limit" for all other covered perils (excluding earthquake and "flood") is:

NOT COVERED

Aggregate Limit — The "aggregate limit" for all other covered perils (excluding earthquake and "flood") is:

NOT COVERED

Catastrophe Limit — The "catastrophe limit" for all other perils (excluding earthquake and "flood") is:

NOT COVERED

COVERAGE EXTENSIONS

LIMIT

Additional Debris Removal Expenses	\$10,000
Emergency Removal	30 DAYS
Limited Fungus Coverage	\$15,000

SUPPLEMENTAL COVERAGES

LIMIT

Foundations Of Buildings, Pilings And Underground Pipes	\$100,000
Newly Acquired Buildings	\$100,000
Ordinance or Law (Undamaged Parts Of A Building)	COVERED
Ordinance or Law (Increased Cost To Repair and Cost To Demolish/Clear Site)	\$100,000
Personal Property — Acquired Locations	\$100,000
Pollutant Cleanup And Removal	\$25,000
Property In Transit	\$50,000

COVERAGE OPTION

Masonry Veneer (check one)

Covered For Loss Caused By Earthquake
 Not Covered For Loss Caused By Earthquake

VALUATION (check one)

Actual Cash Value
 Replacement Cost

DEDUCTIBLES**Earthquake Deductible**

\$25,000

Flood Deductible

NOT APPLICABLE

All Other Covered Perils Deductible

NOT APPLICABLE

INCOME COVERAGE PART**Coverage Options (check one)**

No coverage
 Earnings/"Rents"/Extra Expense
 Earnings/Extra Expense

Income Coverage Limit

NOT COVERED

The Earthquake Limits and Flood Limits are the only "limits" that apply when a covered loss is caused by or results from earthquake or "flood".

Income Coverage Waiting Period

NOT APPLICABLE

OPTIONAL COVERAGES AND ENDORSEMENTS

Endorsement Number

GL0004

Policy Number

S 2013560

SELECTIVE INSURANCE COMPANY OF SOUTH CAROLINA
3426 TORINGDON WAY, CHARLOTTE, NC 28277

POLICY CHANGES

Named Insured and Address: JOHN R FISER INC, JRF PROPERTIES, LLC DBA THE ADAIR COMPANY, JRF PROPERTIES, LLC DBA BROADWAY SQUARE COMPANY, JRF 132 SHERLAKE LN. KNOXVILLE, TN 37922-2307 CONTINUED ON SCHEDULE: IL-7041		Policy Period From: DECEMBER 31, 2016 To: DECEMBER 31, 2017 Endorsement Effective Date: OCTOBER 19, 2017
Producer TIS INSURANCE SERVICES INC.		Producer Number: 00-41015-00000
COVERAGE PART AFFECTED COMMERCIAL GENERAL LIABILITY COVERAGE PART		
THIS ENDORSEMENT CHANGES THE POLICY. PLEASE READ IT CAREFULLY.		
PREMIUM BASIS AMENDED AS FOLLOWS: LOCATION # 074 /BUILDING # 001 INFORMATION HAS CHANGES AS FOLLOWS: THE PREMIUM BASIS FOR CLASS CODE 61212 IS AMENDED TO 7,500. THE FOLLOWING GENERAL LIABILITY FORM(S) AND ENDORSEMENT(S) ARE CHANGED: AND ARE EFFECTIVE WITH THE EFFECTIVE DATE OF THIS CHANGE: IL7025A 11/89 COMMERCIAL POLICY INFORMATION PAGE IL7028 03/94 POLICY CHANGES ENDORSEMENT TOTAL GENERAL LIABILITY ADDL/RETURN PREMIUM: 33.00		
Forms and Endorsements: IL 70 25A 1189 COMMERCIAL POLICY INFORMATION PAGE CG 70 35 0690 COMMERCIAL LIABILITY COVG DECLARATION CG 00 01 0413 CGL COV FORM (OCCURRENCE) CG 03 00B 0196 DEDUCTIBLE LIABILITY INSURANCE CONTINUED ON SCHEDULE: IL-7035		Additional Endorsement Premium \$33.00 REG - 1 (This premium may be subject to adjustment.)
Date Issued: OCTOBER 24, 2017 Issuing Office: SOUTHERN REGION		Authorized Representative

Policy Number

S 2013560

COMMERCIAL POLICY FORMS AND ENDORSEMENT SCHEDULE

Policy Effective Date: DECEMBER 31, 2016

Schedule Effective Date: OCTOBER 19, 2017

CONTINUATION OF FORMS FOR ENDORSEMENT NUMBER GL0004.

CG 04 35	1207	EMPLOYEE BENEFITS LIAB COVERAGE
CG 20 18	0413	ADDL INSD-MORTGAGEE, ASSIGNEE, RECVR
CG 21 06	0514	EXCL ACCESS DISCL CONC PERS INF-W/LIM BI
CG 21 47	1207	EMPLOYMENT-RELATED PRACTICES EXCL
CG 21 67	1204	FUNGI OR BACTERIA EXCLUSION
CG 21 70	0115	CAP ON LOSSES FROM CERT ACTS OF TERROR
CG 25 03	0509	DESIGNATED CONST PROJECT(S) AGG LIMIT
CG 25 04	0509	DESIGNATED LOCATION(S) GENERAL AGG LIMIT
CG 73 00	0116	ELITEPAC GL EXT END
CG 79 35	0708	PRODUCT RECALL EXPENSE COV ENDT
IL 00 03	0908	CALCULATION OF PREMIUM
IL 00 17	1198	COMMON POLICY CONDITIONS
IL 00 21	0908	NUCLEAR ENERGY LIABILITY EXCLUSION
IL 02 50	0908	TN CHANGES-CANC. AND NONRENEWAL
IL 09 85A	0115	DISCL PURSUANT TO TERR RISK INS ACT
IL 70 01	0188	ADDITIONAL NAMED INSURED ENDORSE
IL 89 48	0100	EXCLUSION - LEAD HAZARD
IL 89 56	0899	ASBESTOS EXCLUSION
IN 01 29	0116	NOTICE - OFFER OF TERR COV AND REJECTION
IN 00 02	0100	NOTICE-REDUCTION ON IL 8948
IN 00 03	0904	FACTS REGARDING PREMIUM AUDIT
IN 00 68	0699	IMPORTANT NOTICE ASBESTOS EXCLUSION
IN 01 06	1204	IMPORTANT NOTICE FUNGI OR BACTERIA
IN 05 63	0116	IMPORTANT NOTICE - ELITEPAC GL EXT

NOTICE TO POLICYHOLDER: All the forms and endorsements contained in this policy as of the "Schedule Effective Date" are listed above. Forms and endorsements added to the policy after this date will appear on a "Policy Changes" endorsement. Please read your policy and all "Policy Changes" carefully.

NOTE: All applicable "IL" endorsements will be attached in the Common Section of the policy.

Previous Policy Number

S 2013560

Policy Number

S 2013560

COMMERCIAL LIABILITY COVERAGE DECLARATION

Policy Effective Date: DECEMBER 31, 2016

Coverage Effective Date: OCTOBER 19, 2017

Business of Named Insured: LESSORS RISK

Insurance is provided only for those coverages for which a specific limit is shown in the following coverage schedule.

Coverage Limits

COMMERCIAL GENERAL LIABILITY

General Aggregate Limit (Other Than Products-Completed Operations)	\$2,000,000
Products-Completed Operations -- Aggregate Limit	\$2,000,000
Personal and Advertising -- Injury Limit	\$1,000,000
Each Occurrence Limit	\$1,000,000
Fire Damage Limit -- Any One Fire	\$500,000
Medical Expense Limit -- Any One Person	\$15,000

Commercial Liability Premium (\$)

Classification	Class Code	Premium Basis	Rates		Advanced Premium	
			Premises-Operations	Products-Completed Operations	Premises-Operations	Products-Completed Operations
ELITEPAC GENERAL LIABILITY EXTENSION ENDORSEMENT					\$1,500.00	
TERRORISM					\$836.00	
EMPLOYEE BENEFITS LIABILITY	92100		FLAT	CHARGE	\$157.00	----
LOCATION #001 BUILDING #001						
SHOPPING CENTERS BLGS PREM (T-503)	67635	2,775 (A)	28.947	INCL.	\$80.00	INCL.
CONCRETE CONSTRUCTION (T-503)	91560	IF ANY (P)	6,984	9.469	PREMIUM CHARGE TO BE DETERMINED UPON AUDIT	
LOCATION #002 BUILDING #001						
SHOPPING CENTERS BLGS PREM (T-503)	67635	11,040 (A)	28.947	INCL.	\$320.00	INCL.
LOCATION #003 BUILDING #001						
SHOPPING CENTERS BLGS PREM (T-503)	67635	171,414 (A)	28.947	INCL.	\$4,962.00	INCL.
LOCATION #004 BUILDING #001						
SHOPPING CENTERS BLGS PREM (T-503)	67635	11,699 (A)	28.947	INCL.	\$339.00	INCL.

CONTINUED ON SCHEDULE: CG-7045

Minimum Premium \$367.00 Total Premium \$9573.00 Total Advanced Premium \$30,551.00 \$34,109.00

Premium and Rate Legend

Location of all premises you own, rent, or control:

Refer to "Schedule of Locations"

(T13)	Land	- rate per acre
(P)	Payroll	- rate per \$1000 of payroll
(A)	Area	- rate per 1000 square feet
(C)	Total Cost	- rate per \$1000 of cost

This Schedule lists all your premises, operations and other exposures, as they exist as of the coverage effective date.

Forms and Endorsements:

Refer to "Commercial Policy Forms and Endorsement Schedule"

Total Advanced Premium

\$42,660.00

(This premium may be subject to adjustment.)

Coverage Effective Date OCTOBER 19, 2017

Policy Number S 2013560

COMMERCIAL LIABILITY SCHEDULE

Classification	Class Code	Premium Basis	Rates		Advance Premium	
			Premises Operations	Products - Completed Operations	Premises - Opérations	Products - Completed Operations
LOCATION #005 BUILDING #001						
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-503)	68702	20,692	(A)	5.983	INCL.	\$124.00 INCL.
LOCATION #006 BUILDING #001						
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-503)	68702	14,485	(A)	5.983	INCL.	\$87.00 INCL.
LOCATION #007 BUILDING #001						
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-503)	68702	13,689	(A)	5.983	INCL.	\$82.00 INCL.
LOCATION #008 BUILDING #001						
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-503)	68702	19,155	(A)	5.983	INCL.	\$115.00 INCL.
LOCATION #009 BUILDING #001						
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-503)	68702	24,960	(A)	5.983	INCL.	\$149.00 INCL.
LOCATION #010 BUILDING #001						
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-503)	68702	24,594	(A)	5.983	INCL.	\$147.00 INCL.
LOCATION #011 BUILDING #001						
BUILDINGS PREM OCCUP EMPL OTHER TH (T-503)	61224	7,000	(A)	35,256	INCL.	\$247.00 INCL.
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-503)	68702	13,760	(A)	5.983	INCL.	\$82.00 INCL.
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-503)	68702	13,006	(A)	5.983	INCL.	\$78.00 INCL.
CARPENTRY (T-503)	91342	124,100	(P)	8.985	9.333	\$1,115.00 \$1,158.0
CONTRACTORS EXEC SUPERVISORS (T-503)	91580	IF ANY	(P)	9.205	INCL.	PREMIUM CHARGE TO BE DETERMINED UPON AUDIT
CONTRACTORS SUB OF BUILDINGS (T-503)	91585	2,586,624	(C)	1.308	1.135	\$3,383.00 \$2,936.0
DRY WALL OR WALLBOARD INSTALLATION (T-503)	92338	4,038	(P)	3.331	3.663	\$13.00 \$15.0
JANITORIAL SERVICES (T-503)	96816	IF ANY	(P)	6.879	INCL.	PREMIUM CHARGE TO BE DETERMINED UPON AUDIT
PAINTING INTERIOR BUILDINGS OR STRUCTURE (T-503)	98305	IF ANY	(P)	4.881	2.902	PREMIUM CHARGE TO BE DETERMINED UPON AUDIT
PAPERHANGING (T-503)	98344	IF ANY	(P)	1.367	1.008	PREMIUM CHARGE TO BE DETERMINED UPON AUDIT
WELDING OR CUTTING	99969	IF ANY	(P)	4.183	4,584	PREMIUM CHARGE

Coverage Effective Date
OCTOBER 19, 2017

Policy Number
S 2013560

COMMERCIAL LIABILITY SCHEDULE

Classification	Class Code	Premium Basis	Rates		Advance Premium			
			Premises Operations	Products - Completed Operations	Premises Operations	Products - Completed Operations		
(T-503)						TO BE DETERMINED UPON AUDIT		
LOCATION #012 BUILDING #001								
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-503)	68702	33,479	(A)	5.983	INCL.	\$200.00 INCL.		
LOCATION #013 BUILDING #001								
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-503)	68702	23,624	(A)	5.983	INCL.	\$141.00 INCL.		
LOCATION #014 BUILDING #001								
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-503)	68702	30,552	(A)	5.983	INCL.	\$183.00 INCL.		
LOCATION #015 BUILDING #001								
SHOPPING CENTERS BLGS PREM (T-503)	67635	71,985	(A)	28.947	INCL.	\$2,083.00 INCL.		
LOCATION #016 BUILDING #001								
SHOPPING CENTERS BLGS PRÉM (T-503)	67635	29,648	(A)	28.947	INCL.	\$858.00 INCL.		
LOCATION #017 BUILDING #001								
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-503)	68702	27,772	(A)	5.983	INCL.	\$166.00 INCL.		
LOCATION #018 BUILDING #001								
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)	68702	35,640	(A)	5.306	INCL.	\$189.00 INCL.		
LOCATION #019 BUILDING #001								
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)	68702	29,150	(A)	5.306	INCL.	\$155.00 INCL.		
LOCATION #020 BUILDING #001								
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)	68702	11,000	(A)	5.306	INCL.	\$58.00 INCL.		
LOCATION #021 BUILDING #001								
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)	68702	30,200	(A)	5.306	INCL.	\$160.00 INCL.		
LOCATION #022 BUILDING #001								
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)	68702	15,600	(A)	5.306	INCL.	\$83.00 INCL.		
LOCATION #023 BUILDING #001								
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)	68702	29,150	(A)	5.306	INCL.	\$155.00 INCL.		
LOCATION #024 BUILDING #001								
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST	68702	33,912	(A)	5.306	INCL.	\$180.00 INCL.		

Coverage Effective Date
OCTOBER 19, 2017

Policy Number
S 2013560

COMMERCIAL LIABILITY SCHEDULE

Classification	Class-Code	Premium Basis	Rates		Advance Premium	
			Premises-Operations	Products-Completed Operations	Premises-Operations	Products-Completed Operations
(T-505)						
LOCATION #025 BUILDING #001						
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)						
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)	68702	14,666	(A)	5.306	INCL.	\$78.00 INCL.
LOCATION #026 BUILDING #001						
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)						
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)	68702	38,097	(A)	5.306	INCL.	\$202.00 INCL.
LOCATION #027 BUILDING #001						
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)						
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)	68702	33,912	(A)	5.306	INCL.	\$180.00 INCL.
LOCATION #028 BUILDING #001						
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)						
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)	68702	38,097	(A)	5.306	INCL.	\$202.00 INCL.
LOCATION #029 BUILDING #001						
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)						
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)	68702	50,200	(A)	5.306	INCL.	\$266.00 INCL.
LOCATION #030 BUILDING #001						
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)						
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)	68702	45,360	(A)	5.306	INCL.	\$241.00 INCL.
LOCATION #031 BUILDING #001						
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)						
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)	68702	52,490	(A)	5.306	INCL.	\$279.00 INCL.
LOCATION #032 BUILDING #001						
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)						
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)	68702	52,490	(A)	5.306	INCL.	\$279.00 INCL.
LOCATION #033 BUILDING #001						
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)						
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)	68702	38,880	(A)	5.306	INCL.	\$206.00 INCL.
LOCATION #034 BUILDING #001						
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)						
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)	68702	21,600	(A)	5.306	INCL.	\$115.00 INCL.
LOCATION #035 BUILDING #001						
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)						
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)	68702	80,000	(A)	5.306	INCL.	\$424.00 INCL.
LOCATION #036 BUILDING #001						
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)						
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)	68702	27,000	(A)	5.306	INCL.	\$143.00 INCL.
LOCATION #037 BUILDING #001						
WAREHOUSES OCCUPIED BY						
WAREHOUSES OCCUPIED BY	68702	12,000	(A)	5.306	INCL.	\$64.00 INCL.

Coverage Effective Date OCTOBER 19, 2017

Policy Number S 2013560

COMMERCIAL LIABILITY SCHEDULE

Classification	Class Code	Premium Basis	Rates		Advanced Premium	
			Premises - Operations	Products - Completed Operations	Premises - Operations	Products - Completed Operations
MULTIPLE INTEREST (T-505)						
LOCATION #038 BUILDING #001 VACANT LAND OTHER THAN NOT FOR PROFIT (T-503)	49451	19	(T13)	.861	INCL.	\$16.00 INCL.
LOCATION #039 BUILDING #001 VACANT LAND OTHER THAN NOT FOR PROFIT (T-503)						
VACANT LAND OTHER THAN NOT FOR PROFIT (T-503)	49451	4	(T13)	.861	INCL.	\$3.00 INCL.
LOCATION #040 BUILDING #001 WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-503)						
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-503)	68702	81,000	(A)	5.983	INCL.	\$485.00 INCL.
LOCATION #041 BUILDING #001 VACANT LAND OTHER THAN NOT FOR PROFIT (T-503)						
VACANT LAND OTHER THAN NOT FOR PROFIT (T-503)	49451	1	(T13)	.861	INCL.	\$1.00 INCL.
LOCATION #042 BUILDING #001 SHOPPING CENTERS BLGS PREM (T-503)						
SHOPPING CENTERS BLGS PREM (T-503)	67635	21,900	(A)	28.947	INCL.	\$634.00 INCL.
LOCATION #043 BUILDING #001 WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)						
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)	68702	60,588	(A)	5.306	INCL.	\$321.00 INCL.
LOCATION #044 BUILDING #001 WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)						
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)	68702	29,700	(A)	5.306	INCL.	\$158.00 INCL.
LOCATION #045 BUILDING #001 WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)						
WAREHOUSES OCCUPIED BY MULTIPLE INTEREST (T-505)	68702	54,000	(A)	5.306	INCL.	\$287.00 INCL.
LOCATION #046 BUILDING #001 VACANT LAND OTHER THAN NOT FOR PROFIT (T-503)						
VACANT LAND OTHER THAN NOT FOR PROFIT (T-503)	49451	48	(T13)	.861	INCL.	\$41.00 INCL.
LOCATION #047 BUILDING #001 WAREHOUSES OCCUPIED BY SINGLE INTEREST (T-503)						
WAREHOUSES OCCUPIED BY SINGLE INTEREST (T-503)	68703	52,990	(A)	4.490	INCL.	\$238.00 INCL.
LOCATION #048 BUILDING #001 VACANT LAND OTHER THAN NOT FOR PROFIT (T-505)						
VACANT LAND OTHER THAN NOT FOR PROFIT (T-505)	49451	54	(T13)	.861	INCL.	\$46.00 INCL.
LOCATION #049 BUILDING #001 WAREHOUSES OCCUPIED BY SINGLE INTEREST (T-505)						
WAREHOUSES OCCUPIED BY SINGLE INTEREST (T-505)	68703	30,000	(A)	3.973	INCL.	\$119.00 INCL.
LOCATION #050 BUILDING #001 BUILDINGS PREM MERC MANF						
BUILDINGS PREM MERC MANF	61212	9,560	(A)	21.360	INCL.	\$204.00 INCL.

Coverage Effective Date OCTOBER 19, 2017

Policy Number S 2013560

COMMERCIAL LIABILITY SCHEDULE

Classification	Class Code	Premium Basis	Rates		Advanced Premium	
			Premises Operations	Products - Completed Operations	Premises - Operations	Products - Completed Operations
OTHER THA (T-503):						
LOCATION #051 BUILDING #001						
BUILDINGS PREM MERC MANF OTHER THA (T-503)	61212	10,465	(A)	21.360	INCL.	\$224.00 INCL.
LOCATION #053 BUILDING #001						
BUILDINGS, PREM MERC MANF OTHER THA (T-503)	61212	40,500	(A)	21.360	INCL.	\$865.00 INCL.
LOCATION #054 BUILDING #001						
WAREHOUSES OCCUPIED BY SINGLE INTEREST (T-505)	68703	110,000	(A)	3.973	INCL.	\$437.00 INCL.
LOCATION #055 BUILDING #001						
SHOPPING CENTERS BLGS, PREM (T-503)	67635	3,311	(A)	28.947	INCL.	\$96.00 INCL.
LOCATION #056 BUILDING #001						
VACANT LAND OTHER THAN NOT FOR PROFIT (T-503)	49451	2	(T13)	.861	INCL.	\$2.00 INCL.
LOCATION #057 BUILDING #001						
VACANT LAND OTHER THAN NOT FOR PROFIT (T-505)	49451	16	(T13)	.861	INCL.	\$14.00 INCL.
LOCATION #058 BUILDING #001						
VACANT LAND OTHER THAN NOT FOR PROFIT (T-503)	49451	5	(T13)	.861	INCL.	\$4.00 INCL.
LOCATION #059 BUILDING #001						
VACANT LAND OTHER THAN NOT FOR PROFIT (T-503)	49451	2	(T13)	.861	INCL.	\$2.00 INCL.
LOCATION #060 BUILDING #001						
VACANT LAND OTHER THAN NOT FOR PROFIT (T-505)	49451	11	(T13)	.861	INCL.	\$9.00 INCL.
LOCATION #061 BUILDING #001						
VACANT LAND OTHER THAN NOT FOR PROFIT (T-505)	49451	19	(T13)	.861	INCL.	\$16.00 INCL.
LOCATION #062 BUILDING #001						
VACANT LAND OTHER THAN NOT FOR PROFIT (T-505)	49451	7	(T13)	.861	INCL.	\$6.00 INCL.
LOCATION #063 BUILDING #001						
VACANT LAND OTHER THAN NOT FOR PROFIT (T-503)	49451	6	(T13)	.861	INCL.	\$5.00 INCL.
LOCATION #068 BUILDING #001						
VACANT LAND OTHER THAN NOT FOR PROFIT (T-503)	49451	2	(T13)	.861	INCL.	\$2.00 INCL.

Coverage Effective Date OCTOBER 19, 2017

Policy Number S 2013580

COMMERCIAL LIABILITY SCHEDULE

Classification	Class Code	Premium Basis	Rates		Advance Premium			
			Premises Operations	Products - Completed Operations	Premises - Operations	Products - Completed Operations		
FOR PROFIT (T-505)								
LOCATION #068 BUILDING #001								
VACANT LAND OTHER THAN NOT FOR PROFIT (T-505)	49451	2	(T13)	.861	INCL.	\$2.00 INCL.		
LOCATION #069 BUILDING #001								
SHOPPING CENTERS BLGS PREM (T-505)	67635	10,667	(A)	25.827	INCL.	\$273.00 INCL.		
LOCATION #070 BUILDING #001								
VACANT LAND OTHER THAN NOT FOR PROFIT (T-505)	49451	3	(T13)	.861	INCL.	\$3.00 INCL.		
LOCATION #072 BUILDING #001								
BUILDINGS PREM MERC MANF OTHER THA (T-505)	61212	605,000	(A)	19.063	INCL.	\$11,533.00 INCL.		
LOCATION #073 BUILDING #001								
BUILDINGS PREM MERC MANF OTHER THA (T-503)	61212	58,000	(A)	21.360	INCL.	\$1,239.00 INCL.		
LOCATION #074 BUILDING #001								
BUILDINGS PREM MERC MANF OTHER THA (T-503)	61212	7,500	(A)	21.360	INCL.	\$160.00 INCL.		

Previous Policy Number
S 2013560

Policy Number
S 2013560

COMMERCIAL INLAND MARINE DECLARATIONS

Policy Effective Date: DECEMBER 31, 2016

Coverage Effective Date: OCTOBER 19, 2017

Insurance is provided only for those coverages shown in the following coverage schedule.

Coverage Schedule

Coverage	Premium
BUILDERS' RISK	\$3,325.00
CONTRACTORS' EQUIPMENT	\$1,219.00
FLOOD AND EARTHQUAKE COVERAGE	\$1,795.00
ELECTRONIC INFORMATION SYSTEMS	\$168.00

Forms and Endorsements:

Refer to "Commercial Policy Forms and Endorsement Schedule".

Premium Amount

\$6,637.00

(This premium may be subject to adjustment.)

Endorsement Number
IR0006

Policy Number
S 2013560

SELECTIVE INSURANCE COMPANY OF SOUTH CAROLINA
3426 TORINGDON WAY, CHARLOTTE, NC 28277

POLICY CHANGES

Named Insured and Address JOHN R FISER INC, JRF PROPERTIES, LLC DBA THE ADAIR COMPANY, JRF PROPERTIES, LLC DBA BROADWAY SQUARE COMPANY, JRF 132 SHERLAKE LN KNOXVILLE, TN 37922-2307 CONTINUED ON SCHEDULE: IL-7041	Policy Period From: DECEMBER 31, 2016 To: DECEMBER 31, 2017 Endorsement Effective Date: OCTOBER 19, 2017
Producer TIS INSURANCE SERVICES INC	Producer Number: 00-41015-00000

COVERAGE PART AFFECTED COMMERCIAL INLAND MARINE COVERAGE PART

THIS ENDORSEMENT CHANGES THE POLICY. PLEASE READ IT CAREFULLY.

FLOOD AND EARTHQUAKE ITEM(S) ADDED AS FOLLOWS:
LOCATION #074/BUILDING #001 HAS BEEN ADDED TO THE INLAND MARINE FLOOD
AND EARTHQUAKE COVERAGE.

THE FOLLOWING INLAND MARINE FORM(S) AND ENDORSEMENT(S) ARE
CHANGED AND ARE EFFECTIVE WITH THE EFFECTIVE DATE OF THIS CHANGE:
IL7025A 11/89 COMMERCIAL POLICY INFORMATION PAGE
IL7028 03/94 POLICY CHANGES ENDORSEMENT

TOTAL INLAND MARINE ADDL/RETURN PREMIUM: 9.00

Forms and Endorsements: IL 70 25A 1189 COMMERCIAL POLICY INFORMATION PAGE CM 70 71 0794 COMMERCIAL INLAND MARINE DECLARATIONS CM 70 96A 0792 CONTRACTORS EQUIPMENT COVERAGE CM 71 00 0310 ELECTRONIC INFORMATION SYSTEMS SUPPL DEC CONTINUED ON SCHEDULE: IL-7035 NOTICE TO POLICY HOLDER: All the forms and endorsements contained in this coverage part as of the Endorsement Effective Date are listed above. Forms and endorsements added to this policy after this date will appear on another Policy Changes endorsement. Please read your policy and all "Policy Changes" carefully.	Additional Endorsement: Premium \$8.00 REG - 1 (This premium may be subject to adjustment.)
Date Issued: OCTOBER 24, 2017 Issuing Office: SOUTHERN REGION	Authorized Representative _____

Policy Number
S 2013560

COMMERCIAL POLICY FORMS AND ENDORSEMENT SCHEDULE

Policy Effective Date: DECEMBER 31, 2016	Schedule Effective Date: OCTOBER 19, 2017
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CONTINUATION OF FORMS FOR ENDORSEMENT NUMBER IR0006

CM 71 04A 0713 BUILDERS RISK SUPPL DEC
IM 78 05 0707 SCHEDULE OF COVERAGES - DIC
CL 01 00 0399 COMMON POLICY CONDITIONS
CL 01 18 0101 AMENDATORY ENDORSEMENT-TN
CL 06 00 0115 CERTIFIED TERRORISM LOSSES
CL 07 00 1006 VIRUS OR BACTERIA EXCLUSION
CM 00 01 0695 COMMERCIAL INLAND MARINE CONDITIONS
CM 70 97 0312 CONTRACTORS EQUIPMENT COVERAGE FORM
CM 71 01 0310 ELECTRONIC INFO SYS COVERAGE FORM
CM 71 05 0713 BUILDERS RISK COVERAGE FORM
CM 71 15 0312 CONTRACTORS EQUIPMENT LEASED/RENTED
CM 71 50 0694 LOSS PAYEES SCHEDULE
CM 71 85 0713 BUILDERS RISK EQUIPMENT BREAKDOWN
CM 72 00 0112 LIBERALIZATION
IL 00 03 0908 CALCULATION OF PREMIUM
IL 00 17 1198 COMMON POLICY CONDITIONS
IL 02 50 0908 TN CHANGES-CANC AND NONRENEWAL
IL 09 52 0115 CAP ON LOSS FROM CERT ACTS OF TERRORISM
IL 09 85A 0115 DISCL PURSUANT TO TERR RISK INS ACT
IM 78 00 0407 DIC-PROPERTY COVERAGE PART
IN 01 29 0116 NOTICE - OFFER OF TERR COV AND REJECTION

NOTICE TO POLICYHOLDER: All the forms and endorsements contained in this policy as of the "Schedule Effective Date" are listed above. Forms and endorsements added to the policy after this date will appear on a "Policy Changes" endorsement. Please read your policy and all "Policy Changes" carefully.

NOTE: All applicable "IL" endorsements will be attached in the Common Section of the policy.

EXHIBIT C



December 20, 2017

Fiser, Inc.
201 Sherlake Lane
Knoxville, Tennessee 37922

Attention: Mr. Chris Cole
ccole@fiserinc.com

Subject: **ADDENDUM NO. 2**
REPORT OF LIMITED GEOTECHNICAL EXPLORATION
Northpark Boulevard Building 4
Alcoa, Tennessee
GEOServices Project No. 21-16708

Dear Mr. Cole:

GEOServices, LLC (GEOServices) is pleased to provide this Addendum No. 2 to our "Report of Limited Geotechnical Exploration, Northpark Boulevard Buildings 4, 5, and 10 Distress Evaluation", dated November 14, 2016. Our services were performed in accordance with our Proposal No. 11-16325, dated October 6, 2016, and as authorized by you. The purpose of this Addendum No. 2 is to provide the results of our review of a "Supplemental Report of Findings", prepared by Rimkus Consulting Group, Inc., (Rimkus), dated December 8, 2017.

Background

GEOServices performed a limited geotechnical exploration at Building 4 the results of which were provided in our November 14, 2016 report. The results of that exploration indicated that subsidence due to sinkhole activity was the most likely cause of the observed distress at Building 4. Subsequently, Rimkus was retained by the Selective Insurance Company to perform an exploration at the site, the results of which were presented in a "Report of Findings", dated March 7, 2017. In this report, Rimkus attributed the distress to conditions not related to sinkhole activity. Information related by Agate Foundations & Piering, Inc. (Agate) personnel during the installation of stabilizing push-piers at Building 4 brought into question the true nature of the cause of the

distress and subsequent exploration was performed by Rimkus. The results of the most recent Rimkus exploration were provided in their previously referenced December 8, 2017 report.

Recent Exploration

During the most recent exploration, two borings B-3 and B-4, were drilled by Rimkus subcontractor Master Drillers, Inc., in the area along the south wall of Building 4. These borings generally encountered 14 to 16 feet of firm to very stiff clay fill soil with few chert fragments. Asphalt and crushed stone was encountered at a depth of about 15 feet in boring B-4.

Residual soil was encountered underlying the fill in each of the borings. The residual soils consisted of soft to stiff clay soil with occasional chert fragments. The soft residuum was encountered in the zone overlying refusal in Boring B-4. Refusal in borings B-3 and B-4 was encountered at depths of 34.5 and 44.0 feet, respectively. Borings B-3 and B-4 were drilled using fluid-rotary (wash) drilling techniques and loss of circulation was observed at depths of 32.5 and 33.5 feet, respectively.

Discussion of Findings Relative to Industry Standard

GEOservices is a consulting engineering firm operating in Knoxville, Tennessee that conducts hundreds of geotechnical explorations each year. Given the geologic setting and soils typically present in East Tennessee, most of our geotechnical services include developing conclusions and recommendations regarding soils having some susceptibility to volume change and the potential for sinkhole development.

In the consulting engineering profession, services are typically performed to a certain standard of care. This standard of care is the level of practice normally exercised by geotechnical professionals operating within a geographic area. It is our opinion that the conclusions in the most recent Rimkus report with regards to soil volume change and sinkhole activity are not consistent with the standard of care normally exercised in this geographic area.



In this addendum we present our conclusions as to cause of the observed distress. Our conclusions are based upon a review of the data obtained during the previous GEOServices and Rimkus explorations for Building 4. We also provide a discussion of our conclusions relative to the standard of care normally exercised by geotechnical engineers practicing in our region.

Soil Volume Change

Table 1 below shows the results of plasticity testing performed on soil samples obtained at Building 4.

Table 1 – Plasticity Test Data

Boring	Depth (ft)	Date ⁽¹⁾	LL (%)	PL (%)	PI (%)
B-3 ⁽²⁾	1.0-2.5	11/14/2016	49	22	27
B-1 ⁽³⁾	6.0-8.0	03/07/2017	64	33	31
B-2 ⁽³⁾	6.0-8.0	03/07/2017	55	33	22
B-3 ⁽³⁾	10.0-12.0	12/08/2017	52	33	19
B-4 ⁽³⁾	8.0-10.0	12/08/2017	37	23	14
B-4 ⁽³⁾	18.5-20.0	12/08/2017	57	36	21

Note 1: Date of report containing the test data

Note 2: GEOServices report

Note 3: Rimkus report

LL – Liquid Limit, PL – Plastic Limit, PI – Plasticity Index

The following paragraph is the standard of care, which respect to the soils susceptibility to volume change, normally exercised by geotechnical engineers providing services in East Tennessee:

According to published data for a climate similar to that of East Tennessee, soils with PIs lower than 30 are slightly susceptible to volume changes, and soils with PIs higher than 50 are generally highly susceptible to volume changes. Soils with PIs between these limits have moderate volume change potential.

From Table 1, it is evident that the soils present at the site primarily fall within the slight range of susceptibility to volume change. Only one of the tested samples is just over the upper limit for the slightly susceptible category. Based on the results of the laboratory testing performed, it is not likely that soil volume change is a potential cause of the distress at Building 4.

Subsurface Conditions Indicative of Sinkhole Activity

Rimkus drilled two borings along the central portion of the south wall as part of the exploratory services at Building 4. Boring B-1 was drilled during the initial exploration and Boring B-4 was drilled during the subsequent exploration. This central area of the building is where the most distress was observed and where the greatest differential floor movement was reported in the Rimkus March 2017 report floor elevation survey.

Boring B-1 encountered a zone of soft soil, approximately 10 feet in thickness, overlying refusal. Boring B-4 of the most recent exploration encountered a similar zone of soft soil (although incorrectly labeled as firm soil on the Rimkus' boring log) overlying refusal. The borings of the recent exploration were drilled using fluid-rotary techniques, and circulation loss was observed at a depth of 33.5 feet in Boring B-4. The depth where fluid circulation was lost was 10.5 feet above the depth of auger refusal and occurred within the residual soil interval.

Subsurface conditions which are considered consistent with sinkhole activity include zones of soft soil overlying bedrock and loss of drilling fluid circulation especially within the residual soil overburden. This is the standard of care with respect to subsurface conditions which are indicative of sinkhole activity practiced by geotechnical engineers in this region.

The following provides a description of the expected residual soil profile in areas of sinkhole activity taken from the text "Building on Sinkholes", by George F. Sowers, 1996: "By way of contrast, residual soils over limestone are usually strongest in the uppermost 3 to 20 ft (1 to 6 m) and with more or less uniform strength for much of the remaining soil depth. However, beginning 5 to 15 ft (1.5 to 4 m) above the limestone surface, the soil becomes significantly softer with increasing depth. This is reflected in the standard penetration resistance, N, shown in Fig 2.10" The attached Figure 1 shows Fig. 2.10 from the reference.

From the same reference, we note: "Often, drilling water or drilling fluid is lost in the soft horizon when making exploratory borings or holes for remedial grouting." with regards to loss of drilling fluid circulation in areas of sinkhole activity.

Both Rimkus borings drilled in the central portion of Building 4, where the most distress was reported, encountered a zone of soft soil approximately 10 feet thick overlying refusal. Boring B-4, which was the only of these two central area borings drilled using fluid rotary techniques, lost fluid circulation at 10.5 feet above refusal in the residual soil.

The zones of soft soil overlying refusal and loss of drilling fluid are common indicators of ongoing sinkhole activity. This conclusion is further supported by a review of the Rimkus ERT Transect 1 (Rimkus March 2017 report) which shows a zone of low resistivity material (consistent with soft soil) below the interval of higher resistivity fill soil in the central building area. Given this information, we do not feel it is reasonable to exclude sinkhole activity as the likely potential cause of the observed distress. We feel that a conclusion similar to ours would be reached by others practicing geotechnical engineering in our area after review of the available information.

Closed Depression

The December 2017 Rimkus report seems to imply that Building 4 was not constructed within a closed contour depression. The attached Figure 2 is a section of the United States Geological Survey (USGS) Geologic Map of the Maryville Quadrangle (Cattermole, 1962) with an aerial overlay produced using the USGS Website (<https://ngmdb.usgs.gov/mapview/>) at the location of Building 4. As it is somewhat difficult to replicate the image in a figure and replicate the opacity feature of the website; the reader is encouraged to visit the USGS website to view the geologic map and aerial photo overlay. Upon review of the USGS map and aerial overlay, it is evident that Building 4 was constructed within a mapped closed contour depression. The entire 900-foot elevation contour shown on the map is hatched, indicating a closed contour depression. The USGS topographic map (which can be viewed using the same USGS website) also clearly shows the closed depression.

The following statement may be used to describe the standard of care with respect to closed depressions typically practiced by geotechnical engineers in this region:

We believe that the process of sinkhole development is ongoing; further, those areas that now contain closed depressions are more likely to develop additional sinkholes or experience

additional subsidence than those areas that do not presently contain these karst features. Because of the uncertain performance of structures founded on soil over sinkholes, it is generally our policy to recommend that buildings not be constructed over closed depressions or sinkholes.

Building 4 is located with a mapped closed contour depression; an area having an elevated risk of sinkhole formation. The existence of the mapped closed depression at Building 4, along with the indications of sinkhole activity encountered in Rimkus borings B-1 and B-4, further supports the conclusion that the observed distress is the result of sinkhole activity.

Existing Fill

The most recent borings from the December 2017 Rimkus report (B-3 and B-4) were drilled in areas near the structure, where the composition and degree of compaction of the existing fill is likely more representative than in the borings drilled away from the structure. The fill encountered in the borings was classified as firm to very stiff clay soil with SPT N-values ranging from 6 to 23 blows per foot. The fill was observed to contain few chert fragments and in one sample, asphalt and crushed aggregate. As noted in the Rimkus report, it is possible that some of the N-values were inflated by the presence of the chert fragments. Given the often stiff to very stiff nature of the fill, it is not thought that the N-values were inflated to the degree where the few chert fragments masked thick zones of soft soil.

Up to 3.5 inches of differential settlement was indicated by the Rimkus floor elevation survey (March 2017 report). It is thought that this amount of settlement related to the existing fill would require thick zones of soft fill or concentrated organic debris undergoing decay and subsequent compression. Neither significant zones of soft soil nor concentrated organic debris was encountered in the borings drilled near the structure.

Conclusion

The borings (Rimkus B-1 and B-4) drilled along the central portion of Building 4 encountered subsurface conditions indicative of sinkhole activity. The borings encountered a zone of soft soil overlying bedrock. Drilling fluid circulation loss was also observed (10.5 feet above the refusal depth) in the only boring drilled with this central area using fluid rotary techniques. The site is

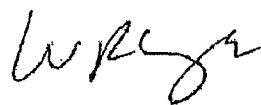
located within a geologic formation favorable for sinkhole development (Knox Group undifferentiated). Further, Building 4 is located with a mapped closed contour depression, an area having an elevated risk for sinkhole formation. Given the relatively higher consistency of the fill in borings B-3 and B-4 drilled near Building 4 and the soils slight susceptibility to volume change, it is our opinion the observed distress is the result of sinkhole induced subsidence. Our conclusions are based upon the applicable standards of our practice in this geographic area.

We appreciate the opportunity to have been of service to you on this project. Please contact us with any questions you may have regarding this letter.

Sincerely,
GEOservices, LLC



Matthew B. Haston, P.E.
Senior Geotechnical Engineer
TN No. 109,269



W. Ros Kingery III, P.E.
Vice President
TN No. 111,645

Attachment: Figure 1 – Figure 2.10 from Reference
 Figure 2 – USGS Geologic Map and Aerial Photo Overlay

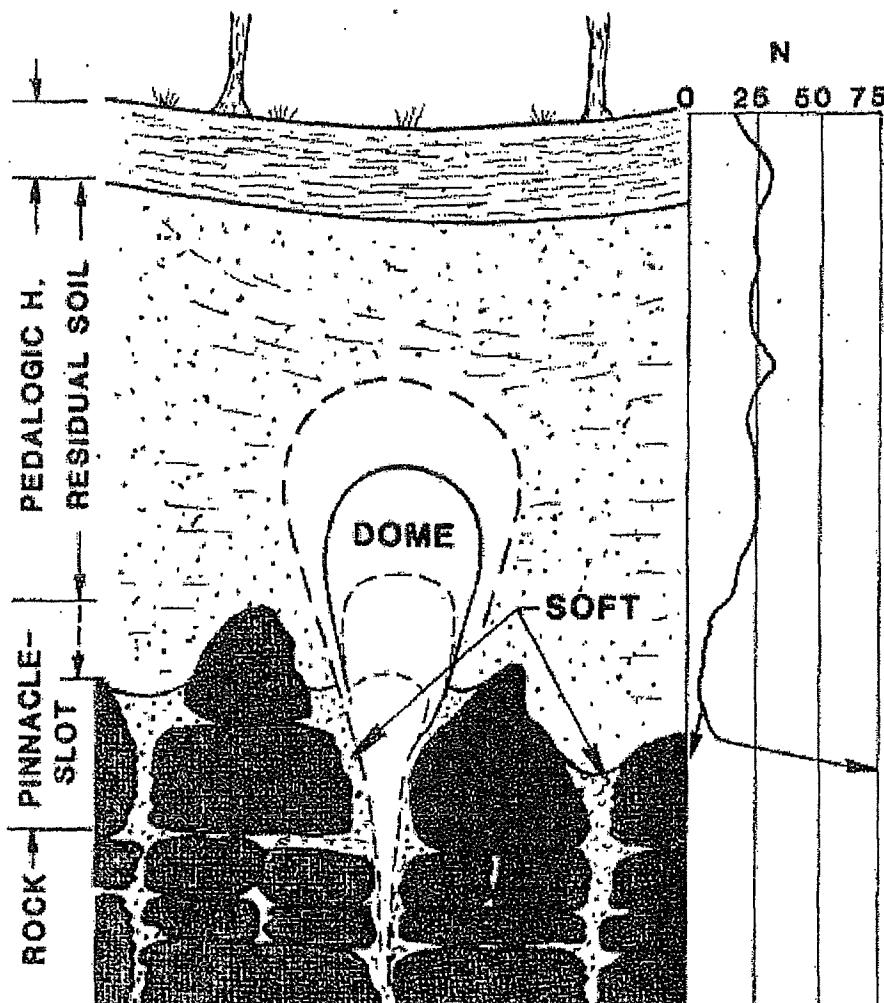


FIG. 2.10. Residual Soil and Rock Profile in Solutioned Limestone with Significant Secondary Porosity in the Form of Vertical and Horizontal Cracks [The Relative Strength of the Residual Materials Are Indicated by the Standard Penetration Resistance, N, in Blows per foot (300 mm) of a 140-lb (63.6-kg) Hammer Falling 30 in. (762 mm) Required to Drive a 1.4-in.(35.6-mm) I.D, 2 in.(50.8 mm) O.D Sampler 1 ft (305 mm)]

Reference: Figure 2.10 from "Building on Sinkholes" by George F. Sowers, 1996.

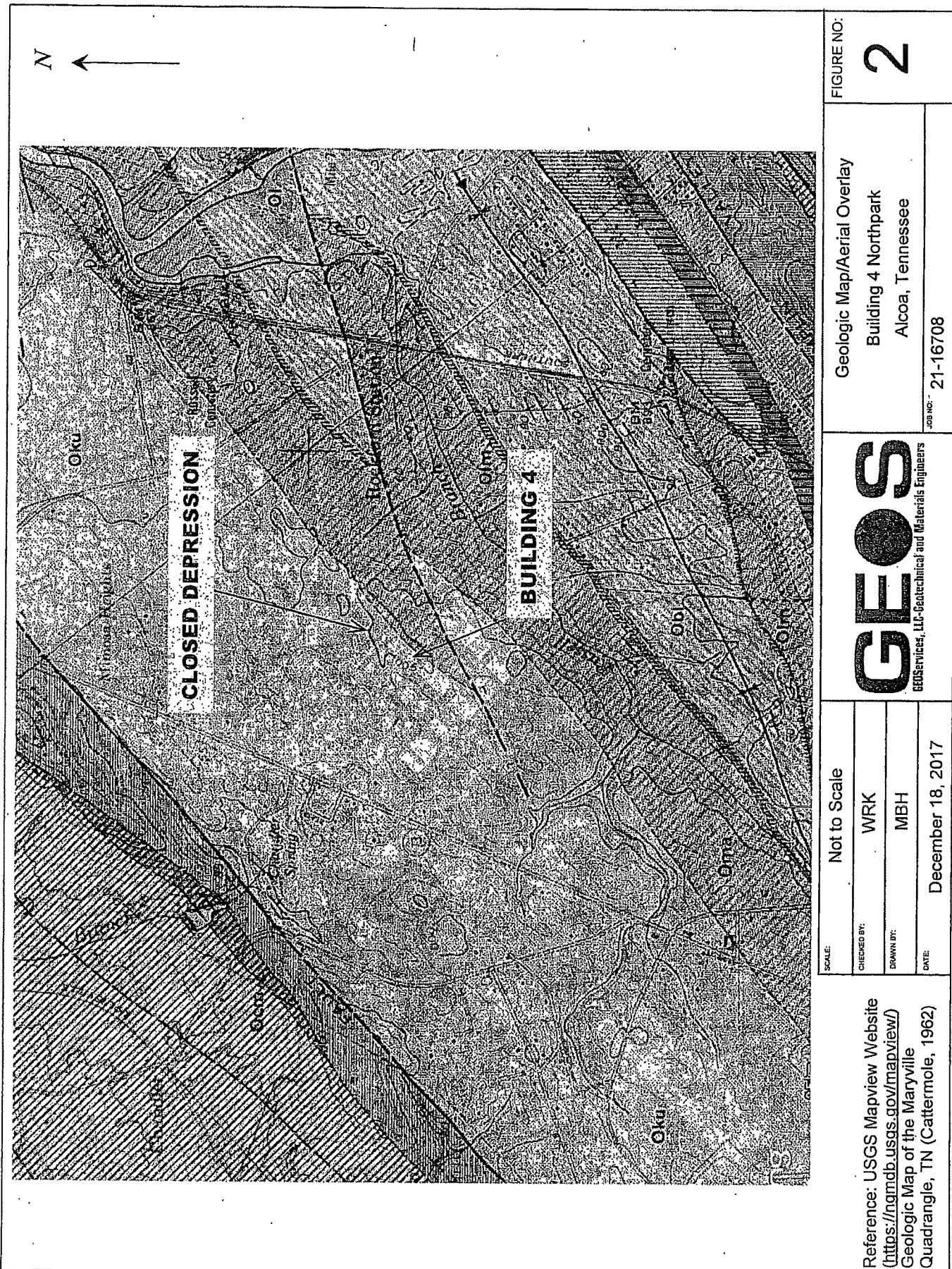
SCALE:	NTS
CHECKED BY:	WRK
DRAWN BY:	MBH
DATE:	December 20, 2017

GEOS
GEOServices, LLC-Geotechnical and Materials Engineers

Figure 2.10 Reference
Building 4 Northpark
Alcoa, Tennessee

JOB NO: 21-16708

FIGURE NO:
1





January 9, 2018

Fiser, Inc.
201 Sherlake Lane
Knoxville, Tennessee 37922

Attention: Mr. Chris Cole
ccole@fiserinc.com

Subject: **ADDENDUM NO. 3**
REPORT OF LIMITED GEOTECHNICAL EXPLORATION
Northpark Boulevard Building 4
Alcoa, Tennessee
GEOServices Project No. 21-16708

Dear Mr. Cole:

GEOServices, LLC (GEOServices) is pleased to provide this Addendum No. 3 to our "Report of Limited Geotechnical Exploration, Northpark Boulevard Buildings 4, 5, and 10 Distress Evaluation", dated November 14, 2016, and our "Addendum No. 2", dated December 20, 2017. Our services were performed in accordance with our Proposal No. 11-16325, dated October 6, 2016, and as authorized by you. The purpose of this Addendum No. 3 is to further expound upon the results of our review of a "Supplemental Report of Findings", prepared by Rimkus Consulting Group, Inc., (Rimkus), dated December 8, 2017 and to provide our professional opinion as to the results of our limited geo technical exploration as set forth herein.

Background

GEOServices performed a limited geotechnical exploration at Building 4 the results of which were provided in our November 14, 2016 report. The results of that exploration indicated that subsidence due to sinkhole activity was the most likely cause of the observed distress at Building 4. Subsequently, Rimkus was retained by the Selective Insurance Company to perform an exploration at the site, the results of which were presented in a "Report of Findings", dated March 7, 2017. In this report, Rimkus attributed the distress to conditions not related to sinkhole activity.

Information related by Agate Foundations & Piering, Inc. (Agate) personnel during the installation of stabilizing push-piers at Building 4 brought into question the true nature of the cause of the distress and subsequent exploration was performed by Rimkus. The results of the most recent Rimkus exploration were provided in their previously referenced December 8, 2017 report. As set forth in our Addendum No. 2 our Findings are consistent with our professional opinion that Building No. 4 has been structurally damaged by foundation displacement or deflection caused by a sinkhole.

Recent Exploration

During the most recent exploration, two borings B-3 and B-4, were drilled by Rimkus subcontractor Master Drillers, Inc., in the area along the south wall of Building 4. These borings generally encountered 14 to 16 feet of firm to very stiff clay fill soil with few chert fragments. Asphalt and crushed stone was encountered at a depth of about 15 feet in boring B-4.

Residual soil was encountered underlying the fill in each of the borings. The residual soils consisted of soft to stiff clay soil with occasional chert fragments. The soft residuum was encountered in the zone overlying refusal in Boring B-4. Refusal in borings B-3 and B-4 was encountered at depths of 34.5 and 44.0 feet, respectively. Borings B-3 and B-4 were drilled using fluid-rotary (wash) drilling techniques and loss of circulation was observed at depths of 32.5 and 33.5 feet, respectively.

Discussion of Findings Relative to Industry Standard

GEOservices is a consulting engineering firm operating in Knoxville, Tennessee that conducts hundreds of geotechnical explorations each year. Given the geologic setting and soils typically present in East Tennessee, most of our geotechnical services include developing conclusions and recommendations regarding soils having some susceptibility to volume change and the potential for sinkhole development.

In the consulting engineering profession, services are typically performed to a certain standard of care. This standard of care is the level of practice normally exercised by geotechnical professionals operating within a geographic area. It is our opinion that the conclusions in the most recent Rimkus report with regards to soil volume change and sinkhole activity are not consistent with the standard of care normally exercised in this geographic area.

In both Addendum No. 2 and this present Addendum No. 3, we present our conclusions as to the cause of the observed distress to Building No. 4 caused by sinkhole activity due to subterranean voids at the building in question. Our conclusions are based upon a review of the data obtained during the previous GEOServices and Rimkus explorations for Building 4. We also provide a discussion of our conclusions relative to the standard of care normally exercised by geotechnical engineers practicing in our region.

Soil Volume Change

Table 1 below shows the results of plasticity testing performed on soil samples obtained at Building 4.

Table 1 – Plasticity Test Data

Boring	Depth (ft)	Date ⁽¹⁾	LL (%)	PL (%)	PI (%)
B-3 ⁽²⁾	1.0-2.5	11/14/2016	49	22	27
B-1 ⁽³⁾	6.0-8.0	03/07/2017	64	33	31
B-2 ⁽³⁾	6.0-8.0	03/07/2017	55	33	22
B-3 ⁽³⁾	10.0-12.0	12/08/2017	52	33	19
B-4 ⁽³⁾	8.0-10.0	12/08/2017	37	23	14
B-4 ⁽³⁾	18.5-20.0	12/08/2017	57	36	21

Note 1: Date of report containing the test data

Note 2: GEOServices report

Note 3: Rimkus report

LL – Liquid Limit, PL – Plastic Limit, PI – Plasticity Index

The following paragraph is the standard of care, which respect to the soils susceptibility to volume change, normally exercised by geotechnical engineers providing services in East Tennessee:

According to published data for a climate similar to that of East Tennessee, soils with PIs lower than 30 are slightly susceptible to volume changes, and soils with PIs higher than 50 are generally

highly susceptible to volume changes. Soils with PIs between these limits have moderate volume change potential.

From Table 1, it is evident that the soils present at the site primarily fall within the slight range of susceptibility to volume change. Only one of the tested samples is just over the upper limit for the slightly susceptible category. Based on the results of the laboratory testing performed, it is not likely that soil volume change is a potential cause of the distress at Building 4.

Subsurface Conditions Indicative of Sinkhole Activity

Rimkus drilled two borings along the central portion of the south wall as part of the exploratory services at Building 4. Boring B-1 was drilled during the initial exploration and Boring B-4 was drilled during the subsequent exploration. This central area of the building is where the most distress was observed and where the greatest differential floor movement was reported in the Rimkus March 2017 report floor elevation survey.

Boring B-1 encountered a zone of soft soil, approximately 10 feet in thickness, overlying refusal. Boring B-4 of the most recent exploration encountered a similar zone of soft soil (although incorrectly labeled as firm soil on the Rimkus boring log) overlying refusal. The borings of the recent exploration were drilled using fluid-rotary techniques, and circulation loss was observed at a depth of 33.5 feet in Boring B-4. The depth where fluid circulation was lost was 10.5 feet above the depth of auger refusal and occurred within the residual soil interval.

Subsurface conditions which are considered consistent with sinkhole activity include zones of soft soil overlying bedrock and loss of drilling fluid circulation especially within the residual soil overburden. The geological findings at Building No. 4 are consistent with sudden settlement or collapse of earth supporting Building No. 4 into clear and discovered subterranean voids created by the action of water on a limestone or similar rock formation. The damage to Building No. 4 has not been caused by simple movement of the earth rather based on the geographical findings has been both sinkhole activity, being settlement or systematic weakening of the earth supporting Building No. 4 resulting from contemporaneous movement or raveling of soils, sediments, or rock materials, into subterranean voids created by the effect of groundwater erosion on a limestone or

similar rock formation. This is the standard of care with respect to subsurface conditions which are indicative of sinkhole activity and collapse practiced by geotechnical engineers in this region.

The following provides a description of the expected residual soil profile in areas of sinkhole activity taken from the text "Building on Sinkholes", by George F. Sowers, 1996: "*By way of contrast, residual soils over limestone are usually strongest in the uppermost 3 to 20 ft (1 to 6 m) and with more or less uniform strength for much of the remaining soil depth. However, beginning 5 to 15 ft (1.5 to 4 m) above the limestone surface, the soil becomes significantly softer with increasing depth. This is reflected in the standard penetration resistance, N, shown in Fig 2.10*"

The attached Figure 1 shows Fig. 2.10 from the reference.

From the same reference, we note: "*Often, drilling water or drilling fluid is lost in the soft horizon when making exploratory borings or holes for remedial grouting.*" with regards to loss of drilling fluid circulation in areas of sinkhole activity. Sinkhole activity and/or sinkhole collapse, as more specifically set forth above, into the subterranean voids are more likely than not the cause of the settling and damage at Building No. 4.

Both Rimkus borings drilled in the central portion of Building 4, where the most distress was reported, encountered a zone of soft soil approximately 10 feet thick overlying refusal. Boring B-4, which was the only of these two central area borings drilled using fluid rotary techniques, lost fluid circulation at 10.5 feet above refusal in the residual soil.

The zones of soft soil overlying refusal and loss of drilling fluid are common indicators of ongoing sinkhole activity. This conclusion is further supported by a review of the Rimkus ERT Transect 1 (Rimkus March 2017 report) which shows a zone of low resistivity material (consistent with soft soil) below the interval of higher resistivity fill soil in the central building area. Given this information, we do not feel it is reasonable to exclude as the report of Rimkus does, sinkhole activity as the likely potential cause of the observed distress. We feel that a conclusion similar to ours would be reached by others practicing geotechnical engineering in our area after review of the available information including but not limited to the loss of fluid circulation at both 10.5 feet

and 33.5 feet as detailed herein more likely than not supports the presence of sinkhole activity and sinkhole collapse, as again stated above.

Closed Depression

The December 2017 Rimkus report seems to imply that Building 4 was not constructed within a closed contour depression. The attached Figure 2 is a section of the United States Geological Survey (USGS) Geologic Map of the Maryville Quadrangle (Cattermole, 1962) with an aerial overlay produced using the USGS Website (<https://ngmdb.usgs.gov/mapview/>) at the location of Building 4. As it is somewhat difficult to replicate the image in a figure and replicate the opacity feature of the website; the reader is encouraged to visit the USGS website to view the geologic map and aerial photo overlay. Upon review of the USGS map and aerial overlay, it is evident that Building 4 was constructed within a mapped closed contour depression. The entire 900-foot elevation contour shown on the map is hatched, indicating a closed contour depression. The USGS topographic map (which can be viewed using the same USGS website) also clearly shows the closed depression.

The following statement may be used to describe the standard of care with respect to closed depressions typically practiced by geotechnical engineers in this region:

We believe that the process of sinkhole development is ongoing; further, those areas that now contain closed depressions are more likely to develop additional sinkholes or experience additional subsidence than those areas that do not presently contain these karst features. Because of the uncertain performance of structures founded on soil over sinkholes, it is generally our policy to recommend that buildings not be constructed over closed depressions or sinkholes.

Building 4 is located with a mapped closed contour depression; an area having an elevated risk of sinkhole formation. The existence of the mapped closed depression at Building 4, along with the indications of sinkhole activity encountered in Rimkus borings B-1 and B-4, further supports the conclusion that the observed distress is the result of sinkhole activity.

Existing Fill

The most recent borings from the December 2017 Rimkus report (B-3 and B-4) were drilled in areas near the structure, where the composition and degree of compaction of the existing fill is likely more representative than in the borings drilled away from the structure. The fill encountered in the borings was classified as firm to very stiff clay soil with SPT N-values ranging from 6 to 23 blows per foot. The fill was observed to contain few chert fragments and in one sample, asphalt and crushed aggregate. As noted in the Rimkus report, it is possible that some of the N-values were inflated by the presence of the chert fragments. Given the often stiff to very stiff nature of the fill, it is not thought that the N-values were inflated to the degree where the few chert fragments masked thick zones of soft soil.

Up to 3.5 inches of differential settlement was indicated by the Rimkus floor elevation survey (March 2017 report). It is thought that this amount of settlement related to the existing fill would require thick zones of soft fill or concentrated organic debris undergoing decay and subsequent compression. Neither significant zones of soft soil nor concentrated organic debris was encountered in the borings drilled near the structure.

Conclusion

The borings (Rimkus B-1 and B-4) drilled along the central portion of Building 4 encountered subsurface conditions indicative of sinkhole activity. The borings encountered a zone of soft soil overlying bedrock. Drilling fluid circulation loss was also observed (10.5 feet above the refusal depth) in the only boring drilled with this central area using fluid-rotary techniques. The site is located within a geologic formation favorable for sinkhole development (Knox Group undifferentiated). Further, Building 4 is located with a mapped closed contour depression, an area having an elevated risk for sinkhole formation. Given the relatively higher consistency of the fill in borings B-3 and B-4 drilled near Building 4 and the soils slight susceptibility to volume change, it is our opinion the observed distress is the result of sinkhole induced subsidence from a sudden settlement or collapse of earth supporting Building No. 4 into the subterranean voids created by the dissolution of limestone or dolostone strata from groundwater erosion causing a surface subsidence of soil, sediment or rock. Our conclusions are based upon the applicable standards of our practice in this geographic area.

Addendum No. 3
Northpark Boulevard Building 4

GEOservices Project No. 21-16708
January 9, 2018



We appreciate the opportunity to have been of service to you on this project. Please contact us with any questions you may have regarding this letter.

Sincerely,
GEOservices, LLC

Matthew B. Haston, P.E.
Senior Geotechnical Engineer
TN No. 109,269

W. Ros Kingery III, P.E.
Vice President
TN No. 111,645

Attachment: Figure 1 – Figure 2.10 from Reference
 Figure 2 – USGS Geologic Map and Aerial Photo Overlay

IN THE CIRCUIT COURT FOR BLOUNT COUNTY, TENNESSEE

JOHN R. FISER, INC.,)

)

Plaintiff,)

)

v.)

No.

EQUITY

SELECTIVE INSURANCE COMPANY)
OF AMERICA,)

)

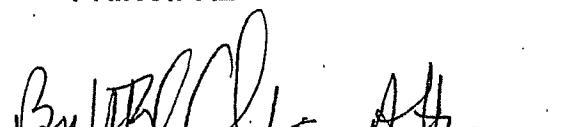
Defendant.)

COST BOND

JOHN R. FISER, INC., as Principal, and Bernstein, Stair & McAdams LLP, as Surety, are held and firmly bound unto the Clerk of the Blount County Circuit Court, for the payment of all costs awarded against the principal. To that end we bind ourselves our heirs, executors and administrators.

The Principal is commencing legal proceeding in the Blount County Circuit Court. If the Principal shall pay all costs which are adjudged against him, then this obligation is void. If the Principal fails to pay, then the surety shall undertake to pay all costs adjudged against the Principal. Mandated at T.C.A. § 20-12-120, et seq.

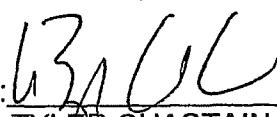
PRINCIPAL


By John R. Fiser, Inc.

JOHN R. FISER, INC.
123 Sherlake Lane
Knoxville, Tennessee 37922

SURETY

BERNSTEIN, STAIR & MCADAMS, LLP


By: W. TYLER CHASTAIN (BPR #016029)
BERNSTEIN, STAIR & MCADAMS LLP
116 Agnes Road
Knoxville, Tennessee 37919
865-546-8030

Service of Process
Dept. of Commerce & Insurance
500 James Robertson Pkwy.-7th Floor
Nashville TN 37243-1131

CERTIFIED MAIL®



7017 1450 0002 1332 9605



FIRST CLASS

7017 1450 0002 1332 9605
10/19/2016
SELECTIVE INS CO OF AMERICA
2908 POSTON AVENUE, % CSC
NASHVILLE, TN 37203

**STATE OF TENNESSEE
Department of Commerce and Insurance
500 James Robertson Parkway
Nashville, TN 37243-1131
PH - 615.532.5260, FX - 615.532.2788
Jerald.E.Gilbert@tn.gov**

October 19, 2018

Selective Ins Co Of America
2908 Poston Avenue, % C S C
Nashville, TN 37203
NAIC # 12572

Certified Mail
Return Receipt Requested
7017 1450 0002 1332 9605
Cashier # 41281

Re: John R. Riser, Inc. V. Selective Ins Co Of America
Docket # L-20005

To Whom It May Concern:

Pursuant to Tennessee Code Annotated § 56-2-504 or § 56-2-506, the Department of Commerce and Insurance was served October 18, 2018, on your behalf in connection with the above-styled proceeding. Documentation relating to the subject is herein enclosed.

Jerald E. Gilbert
Designated Agent
Service of Process

Enclosures

cc: Circuit Court Clerk
Blount County
926 E. Lamar Alexander Pkwy.
Maryville, Tn 37804-6201

DEFENDANTS COPY

IN THE CIRCUIT COURT FOR BLOUNT COUNTY, TENNESSEE

JOHN R. FISER, INC.,

Plaintiff,

v.

SELECTIVE INSURANCE COMPANY
OF AMERICA,

Defendant.

FILED p:15 2018
OCT 01 2018 *86*
TOM HATCHER
CIRCUIT COURT CLERK
No. L-20005
EQUITY

SUMMONS

TO THE ABOVE NAMED DEFENDANT(S):

You are hereby summoned and required to serve upon, W. TYLER CHASTAIN, plaintiff's attorney, whose address is BERNSTEIN, STAIR & McADAMS LLP, 116 Agnes Road, Knoxville, Tennessee 37919, an answer to the complaint herewith served upon you within 30 days after service of this summons and complaint upon you, exclusive of the date of service. If you fail to do so, judgment by default can be taken against you for the relief demanded in the complaint.

Issued and tested this 1 day of Oct. 2018.

Tom Hatcher
CLERK
Debt
DEPUTY CLERK

NOTICE

To the defendant(s):

Tennessee Law provides a ten thousand dollars (\$10,000.00) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by Law and do not need to be listed; these include items of necessary wearing apparel for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

SERVICE INFORMATION

To the process server: **SELECTIVE INSURANCE COMPANY OF AMERICA** may be served through its registered agent, Insurance Commissioner, Tennessee Department of Commerce and Insurance, 500 James Robertson Parkway, Nashville, Tennessee.

RETURN

I received this summons on the _____ day of _____, 2018.

I hereby certify and return that on the _____ day of _____, 2018.

____ I served this summons and a complaint on defendant _____ in the following manner:

____ I failed to serve this summons within 90 days after its issuance because:

Process Server